

Coralville Environmental Assessment Comment Summary/Response With Letter Code Cross Reference

1 Purpose and Need

1-1 The camp is not needed in North Liberty.

The needs and concerns of the local citizens and governing organizations are important and will be considered in the decision making process for the proposed lease of the former Camp Daybreak site. However, regional needs, resource capabilities and suitabilities, recreational diversity within the region, and the Coralville Lake project purposes are also factors on which this decision will be based.

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1-2 Are nonprofit groups restricted from using other public land at Coralville Lake?

The lands and public recreation facilities at the project are open to general public use; however, there are no sites that are developed with the facilities to accommodate the type of group recreational use proposed at this site. As explained in part 3.0 Alternatives, alternative sites at the project were considered for use and development by a nonprofit organization as proposed by MYCA and only the former Camp Daybreak site met all of the criteria for further consideration. The Corps has the authority to lease land to nonprofit organizations for recreational purposes.

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2 Alternatives

2-2 The EA failed to address all site lease locations for MYCA. MYCA previously bought private land on the northside of Coralville Lake located off Roberts Ferry Road.

The property in question is owned by a familial relative of one of the MYCA board members. However, the landowner is not and has not been involved with the MYCA group and this proposed development. All project lands at Coralville Lake were examined to determine which lands would be appropriate for the proposed action. A determination was made that only lands designated Recreation/Intensive or Leased Lands were appropriate for the level of use and development proposed. All other project lands were eliminated from further evaluation. Only lands designated Recreation/Intensive or leased lands were considered viable options for this proposed lease. The area adjacent to the property in question is designated Reserve Forest and is therefore not appropriate for the level of use and development proposed by MYCA.

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2-3 Were there attempts by the Corps to lease property to other non-profit organizations at this site or other sites? What other groups have pursued a lease on the property?

Historically, there have been three former leases to nonprofit organizations at Coralville Lake. This is the only recent attempt to lease property to a nonprofit organization. Corps regulations do not require competition to grant leases for recreational use to nonprofit organizations. Nonprofit organizations known to have an interest in leasing the site were asked to submit proposals for development and use of the site. Lease proposals were received from Camp IO-DIS-E-CA and Muslim Youth Camps of America.

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2-4 Why was North Point not considered as an alternative site given the amount of tree removal that will be required at the site?

Screening parameters for alternative sites were based upon resource features suitable for intensive recreation use by a nonprofit organization, similar to those resources available for the proposal submitted by MYCA for the Camp Daybreak site. Forest cover of at least 50% was deemed necessary when MYCA programs and proposed uses were considered. The type and quality of forest cover of the areas considered was evaluated. The former Camp Daybreak site is approximately 90-95% forested. The portion of North Point under consideration has approximately 38% forest cover; 67 of the 108 acres were previously used for agriculture. The total amount of forestland disturbance for the MYCA proposal is limited to approximately 4.8 acres.

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2-5 Proposed level of use is too exclusionary in that it does not allow public access at all times of the year.

Vast areas of the project are open to general public access. The purpose of leasing for nonprofit group recreational use is to have a variety of recreational opportunities at the project. The lease to nonprofit organizations provides that the lessee agrees to make the site and facilities available to other nonprofit organizations on a first come, first served reservation basis when not scheduled for use by the lessee organization. The lease also provides that the lessee shall not forbid the full use by the public of the water areas of the project, subject to the authority and responsibility of the lessee to manage the premises and provide safety and security for the facility users.

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2-6 The level of use in the summer should be such that the community would have access to the property in the summer. A reservation system could be used to give preference to non-profit groups.

Please see response to comment 2-5.

GP98

2-7 I am against the development of this land to the size of the proposed project area. A low-density project or an alternative with no development seems more appropriate. The scale of the proposed project is too large.

The proposed project is located within an area designated by the Master Plan for use by an outgrant to nonprofit organizations. The proposed use of the site as a camp is consistent with the Master Plan designation of the site for Recreation/Intensive Use. Please see response to comment 2-11. The highest use alternative, Alternative 1, was based on the proposal outlined in the MYCA lease application. The EA evaluated the potential environmental impacts based on that proposal, as well as three lesser levels of use and development.

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2-9 Alternative 3 is more in line with the needs of the community and local residents.

Alternatives were evaluated for consistency with the Master Plan, which designates the project site as an outgrant area. The Master Plan identifies adequate lands located outside of the outgrant areas to meet the recreational needs of the community and local residents.

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2-10 Are the impacts of Alternative 1 significant? I believe they are not significant.

The analysis contained in the EA includes a finding of no significant impact to the environment.

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2-11 Why is the camp so large? Such a large camp goes against the Corp's Master Plan. A camp the same size as the Girl Scout Camp Daybreak seems more appropriate.

The Corps' Master Plan describes and delineates land use designations at Coralville Lake. This plan does not describe specific site density requirements. All proposed plans for development at Coralville Lake must be approved by the Corps prior to construction. The proposed development of former Camp Daybreak site by MYCA is for nonprofit group use only and is appropriate at this location, based on the Master Plan land use designation. The size of the camp is based on environmental sustainability, carrying capacity, and design factors. The impacts of the alternative uses with relation to size have been evaluated in the Environmental Assessment.

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2-12 Alternative 3 should be the preferred alternative because it is consistent with the purpose and need. This alternative is supported by the 1977 Master Plan which states an abundance of high density recreation areas and a lack of places of quite and solitude.

In the 1977 Master Plan, the use of the Camp Daybreak site is designated as leased lands for nonprofit group use. This designation was made after an analysis of the need for recreation areas, as well as other uses, around the lake. The proposed use of the site as a nonprofit group use area is consistent with the purposes and needs of the Master Plan and with the land use designation for the site. Land use designations by category from the 1977 Master Plan are as follows: Project operations (0.2%), Recreation/Intensive-not leased (17%), Recreation/Low Density (2.5%), Reserve Forest (13%), and leased lands (67%). The Leased Land category includes leases with the Iowa Department of Natural Resources for the Hawkeye Wildlife Area, 58% of project lands, and Lake Macbride State Park, 5% of project lands. The Camp Daybreak site is 0.5% of project lands.

GP18

2-13 Alternative 3 should be the preferred alternative because of the commitment of the Corps to the Raptor Project and the need to follow U.S. Forest Service Guidelines.

The Corps of Engineers is governed by Corps' specific guidelines and regulations. U.S. Forest Service guidelines are not applicable to Corps' managed lands. The Corps has a long-standing working relationship with the Raptor Center and a partnership with the Iowa Department of Natural Resources, the Raptor Center and others to promote osprey recovery in the state of Iowa. Placement of nesting platforms is coordinated through this partnership. Locations for four new nesting platforms were coordinated in early 2002 with the Raptor Center, including several proposed remote sites. The Raptor Center stated that it was preferable for the nesting platforms to be located where people could easily see them for observational purposes as well as to generate interest with the general public.

GP18

2-14 Another non-profit group interested in leasing the area would have less of an impact than the MYCA plan or Alternative 2.

The Corps considered proposals to lease the site and chose to pursue the MYCA proposal. The Environmental Assessment was prepared using the level of development and use in the MYCA proposal as one of the alternatives considered. If the Environmental Assessment results in a decision that the level of development and use based on the MYCA proposal will have no significant environmental impacts, the Corps will pursue a lease with MYCA.

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- 2-15 I would rather see North Liberty build a park/campsite on the land. The site would then be open for use by anyone.**

Based on the "leased" zoning classification in the Master Plan, the site may be available for use by North Liberty for public recreation. However, few areas are zoned for nonprofit group use. Leasing this area to North Liberty would reduce the opportunities for nonprofit leasing at Coralville Lake. Furthermore, North Liberty would be required to cost-share the construction of any new facilities and operate and maintain those facilities entirely at village expense. By the time the Corps became aware of North Liberty's interest in the former Camp Daybreak site, the prospective lessee (MYCA) had already been chosen. In addition, North Liberty has not formally contacted the Corps regarding their interest in leasing this area. In the event the Camp Daybreak area is not leased to MYCA, North Liberty may present a lease proposal to the Corps.

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- 2-16 I disagree with the finding of no impact if nothing is done. Doing nothing to "natural areas" creates negative ecological impacts.**

The finding of no impact is indicative that there will be no change in the characteristics of the site.

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- 2-17 Leave the site alone and allow the natural biodiversity to remain.**

Leaving the site alone reflects the "No action-no current plans for development or lease alternative". This Alternative does not serve the intended use of the land as set forth in the Master Plan or the current recreational need for nonprofit use.

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- 2-18 MYCA alternative is not appropriate for the site.**

Alternative 1: MYCA Lease is consistent with the Master Plan, and is therefore considered an appropriate use for the site. Please see response to comment 2-11.

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- 2-19 The site is better suited for low impact outdoor recreational uses, considering the area is primarily a woodland and lake setting.**

Low density outdoor recreation reflects alternative 3 which is not consistent with the Corps Master Plan. In addition, the site can sustain the impacts of high density use without significant adverse impacts as determined in the Environmental Assessment.

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- 2-20 Doesn't Jolly Roger Marina already constitute maximum use? How can a small, already overused peninsula stand much more diversified use?**

Jolly Roger Marina, a commercial concessionaire, provides a very different service to the public than the proposed nonprofit group use of the former Camp Daybreak area. The cumulative impacts of the marina and the proposed use of Camp Daybreak have been evaluated and determined to be insignificant. Both of these areas combined represent only a small fraction of the land area of the peninsula.

GP81

3 Lease

3-1 How will MYCA's compliance with their lease be monitored and enforced?

The lease requires that the construction, operation and maintenance of the lease area be in accordance with development and management plans to be approved in writing by the Corps of Engineers. If the Corps negotiates a lease of the site with MYCA or any other group, they will be required to provide detailed plans for development and management of the area which will be reviewed and approved by the Corps to determine that they are within the scope considered in the Environmental Assessment. Any plans for development and use of the site outside the scope of the Environmental Assessment will be subject to further environmental review. The Corps will conduct periodic inspections of the lessee's development and use of the area to ensure that it is in compliance with the terms and conditions of the lease and the development and management plans. The lessee is also required to comply with any applicable state and local requirements regarding the development and use of the premises and is subject to any inspections state and local authorities may make to enforce their requirements.

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3-2 Why will the lessee be allowed to build a "private residence"?

Lessees of property leased for recreational purposes can be authorized to construct a caretaker residence on the lease area to provide for security, supervision and maintenance of the property.

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3-3 How will MYCA and the public interact over the use of the lakeshore?

The lease provides that the lessee shall not forbid the full use by the public of the water areas of the project, subject to the authority and responsibility of the lessee to manage the premises and provide safety and security for the facility users. Please see response to comment 2-5.

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3-4 Has a full "scope and purpose" of the lease agreement period been established relating to how growth will be accommodated on the site; regulations and requirements for the leased period; restrictions and limitations, and term of lease?

The terms and conditions of a lease have not been negotiated. The lessee will be required to provide final plans for the development and use of the lease area for approval by the Corps. Corps regulations provide that the term of the lease will be commensurate with the extent of development proposed and will generally not exceed 25 years.

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3-5 After the lease expires, who maintains the property?

The lessee is responsible for removing any improvements and restoring the lease area upon termination of the lease

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3-6 Will the camp be open to the public to observe the daily practices?

The development and use of the area is intended to be primarily for organized groups and the lessee will have the authority and responsibility to manage the premises and provide safety and security for the facility users. The lessee will exercise control over how much access the general public has to activities of the groups that are using the area in exercising that authority.

GP70

3-7 What is meant by "religious activities" at the site?

MYCA is affiliated with the Muslim faith and the lessee is to make the site available for use by all types of groups, including those with religious affiliations. It is expected that groups with religious affiliations will include religious activities in their use of the lease area.

GP97

3-8 What is meant by "multi-cultural" campers using the site?

Multicultural refers to persons from a variety of nationalities and divergent ethnic, religious and social backgrounds.

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3-9 Who will bear the cost for the construction to set-up the camp?

The cost of development, operation, and maintenance of the lease area is the responsibility of the lessee.

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3-10 The Corps is planning to lease the land down to the water's edge which would restrict public access to the lakeshore and give MYCA lakeside privileges not provided to others. The public currently has access to this land and water by way of this land. Will the public have access under the MYCA proposal?

The development and use of this site as a nonprofit group recreation area will provide a higher level of recreational use than the site provides in its current state. While this use of the site by organized groups will require that open access to the site by the general public be controlled, the overall opportunities for recreational use is increased by providing an area that is developed and managed for organized group recreation activities. This site will serve another segment of the recreating public.

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3-11 Specifically, what is the lessee required to provide prior to a lease being signed?

The lessee will be required to provide final development and management plans prior to the Corps granting a lease.

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3-12 If the current lease proposal is approved, we would like a specific procedure for adjacent landowners to follow should we have problems. Specifically, we would like names/phone numbers (including off-hours) and an assurance of timeliness of response.

For matters pertaining to the Corps of Engineers and administration of the lease or the Coralville Lake project, residents may contact the Corps of Engineers Real Estate Division at 309-794-5263 or the Coralville Lake Project office at 319-338-3543. Matters involving law enforcement and protection of property should be referred to the local law enforcement authorities. The response will be treated the same as any other similar problem and the response time would depend on the nature of the problem and other variables.

GP44

3-13 We have been assured by the Corps Real Estate Division and others that only group recreational use of the leased premises would be allowed under the non-profit type of lease being considered under alternative #1. The EA references family retreats and weddings in several places in the EA. Weddings and family reunions are not organized group recreational use. Weddings are certainly commercial use. I would consider family reunions either personal or commercial use.

The Corps considers the use of the facilities for organized family gatherings and wedding parties to be a form of organized nonprofit group recreation activities.

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3-14 Is a DNR approved water treatment system required before a lease is signed?

The Corps will require approval by the Iowa Department of Natural Resources for the wastewater treatment system prior to the commencement of the development on the lease area. If the Department of Natural Resources requires that the lessee demonstrate that they have control of the property prior to issuing the permit, the Corps will grant the lease subject to the lessee obtaining the permit.

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3-15 The lease is too exclusive, children of all faiths should be allowed to attend the camp.

The MYCA proposal states that the target audience for its summer youth programs include Muslim, non-Muslim and international youth.

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3-16 MYCA has no experience running a camp. Why was this not considered in the selection process?

The selection committee considered all information provided with the proposals and used criteria which they felt were most pertinent to evaluating the proposals. The committee found the proposal by Muslim Youth Camps of America to be the best overall proposal for development and use of the area.

GP44

3-17 Is the Corps going to go public with lease opportunities for the site?

Sites intended for lease to nonprofit organizations are not offered to the general public. Nonprofit organizations known to have an interest in leasing the site were asked to submit proposals for development and use of the site.

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3-18 Request information on the lease criteria, analysis, and recommendation.

Due to the volume of information regarding this process and the subsequent lessee selection, the material will not be enclosed. The lessee selection process is described in comment 3-19.

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3-19 Based on the criteria selection forms I do not see how the MYCA facility was selected over the IO-DIS-E-CA application. I would like an explanation showing how MYCA was selected over IO-DIS-E-CA.

Criteria to review the proposals were established and the members of the committee reviewing the proposals each did a preliminary independent review and evaluation of the proposals prior to any meeting and discussion of the proposals with other members of the committee. This was done so each member of the committee would begin the evaluation process independently without influence from other committee members, to help the committee identify those items that needed further discussion and evaluation to reach a decision, and also to give a preliminary indication if there was an overwhelming consensus favoring one of the proposals prior to any discussion of the proposals among committee members. This individual evaluation was not intended to be the basis for a final decision by the committee to recommend one proposal over the other. The committee then discussed and evaluated the proposals as a group to come to a decision and recommend one of the proposals to pursue for a lease.

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4 MYCA Site Plan

4-1 What plan does MYCA have for maintenance areas and recreational facilities on the site?

If MYCA is selected and approved as the lessee, they would be responsible for operation and maintenance of the premises. A Development and Management Plan would be prepared and incorporated into the lease. The Development and Management Plan would designate where improvements would be placed, and explain how the facilities and premises would be managed, operated, and maintained. Due to the preliminary nature of the lease application, a Development and Management Plan has not been finalized at this time.

GP27

- 4-2 Different costs for the MYCA development have been reported. It would appear that they are trying to downplay the impact to the site by reducing the overall costs of development.**

The development costs cited in the EA are the costs contained in the materials submitted in support of the Lease Application prepared by MYCA in 1999.

GP27

- 4-3 How many children and workers are planned to be at this camp?**

The proposed camp would be designed to accommodate approximately 120 campers and 16 staff on a daily basis.

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- 4-4 Have other MYC's (Muslim youth camps) experienced any trouble?**

This would be the first camp developed by the lease applicant (MYCA). Information about any existing Muslim youth camps was not examined.

GP70

- 4-5 What amount of construction will take place, and what is the time frame for completion?**

The development proposed is as described in the Environmental Assessment. The proposal submitted by MYCA indicates that the majority of the development would take place over a period of three years.

GP70

- 4-6 Exactly how many acres of wildlife habitat will be removed for infrastructure, including roads, sewers, utilities, play areas, buildings, parking lots, walkways, yards, play areas, campsites, beach area, etc.?**

The footprint area, which would contain all development, for Alternative 1 MYCA Lease is 4.8 acres; Alternative 2: Reduced Use is 2.3 acres; Alternative 3: Alternate Use is 0.1 acre; and Alternative 4: No Action is 0 acres.

GP44

- 4-7 Is sand allowed to be "barged in"? Is this then a public beach? If not, why not?**

Placement of sand for beach construction would be covered under the Section 404 and 401 permit process. See response to comment 2-5.

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- 4-8 The scope of this construction work is extensive. MYCA is not qualified to oversee a project of this scope. In the event that construction of the compound and convention center would occur, who is to oversee this construction? What methods would be used to mitigate the adverse effects associated with a large-scale construction project in an environmentally sensitive area?**

MYCA has hired architects to prepare preliminary designs for the camp. They will continue to utilize professional architects and construction managers as the project proceeds. The proposed development does not include the construction of a compound or a convention center, but rather a camp for youth. During construction of the camp the Corps of Engineers, the Iowa DNR, Johnson County and other applicable regulatory agencies would be involved verifying that the camp would be constructed according to code. No significant adverse impacts were identified from any of the alternatives; therefore no mitigation would be required. The 106 acre site has not been identified as an environmentally sensitive area.

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5 Security

- 5-1 Will the security guard on site be armed?**

The MYCA proposal makes provisions for an on-site caretaker. There is no indication that MYCA will employ security personnel authorized to carry firearms.

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- 5-2 On occasion, Girl Scouts from the old Girl Scout Camp were found wandering in the adjoining subdivision. This problem is only likely to increase with the increased use of the proposed lease.**

Proposed operation of the camp would include 16 on-site staff, including an on-site caretaker. These staff members will be employed by the camp to provide supervision of the camp attendees. Campers leaving the facility is not anticipated to be a common occurrence.

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- 5-3 How does the Corps expect landowners to protect their property from the intrusion of 4,000-5,000 persons per year, including high-risk youth? Provide a specific course of action. We ask this question because of the proximity of the development to our homes.**

Matters involving law enforcement and protection of property should be referred to the local law enforcement authorities. Please see response to comment 5-5.

GP44

- 5-4 The EA fails to address neighborhood/community security.**

Johnson County Sheriff's Department presently serves the area, and it is anticipated that they would continue serving the area after construction of the camp. Proposed operation of the camp includes 16 onsite staff, including an on-site caretaker. These staff members would be employed by the camp to provide supervision of the camp attendees.

GP96

- 5-5 Trespassing is a valid concern and was not addressed in the EA.**

The proposed camp includes a year-round residence for the Camp's director or caretaker to provide continual presence on the site for added security. This year-round presence is intended to minimize the potential for trespassing. Please see response to comments 5-2 and 5-3.

GP18

- 5-6 What forms of screening will be used for international visitors to this facility?**

International visitors are subject to applicable screening requirements when they enter the country. There is no further screening requirement for international visitors to enter the proposed lease area.

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- 5-7 Safety issues regarding the use of the MYCA facility by inner-city youth was not addressed in the EA. Specific concerns relate to gang activities and drug use of inner-city youth.**

Please see response to comment 5-2.

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- 5-8 The presence of the Muslim camp raises concern for safety, specifically with regard to the potential increase in terrorist activities.**

The Corps is complying with all national security requirements applicable to leasing this property to MYCA or any other group. The Corps has taken initiatives to ensure the security of public assets.

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- 5-9 Allegations that the camp was associated with terrorists are unfounded.**

Comment noted.

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6 Corps Master Plan

6-1 Land use designations and restrictions of the project are inconsistent with elements of Corps management and planning documents that pertain to Coralville Lake including the 1977 Master Plan, the Lakeshore Management Plan, and the Forest Resource Inventory (1990).

The Corps land use designations for the proposed lease site have been correctly interpreted and applied. Volume I of the 1977 Master Plan, page 29, describes all of the leased lands to non-federal agencies or groups at Coralville Lake for various forms of public use. This list includes lease of the Camp Daybreak site to Cardinal Council of Girl Scouts. All of these organizations and their associated development are considered non-federal recreation development. Another term used by the Corps for this type of development is "quasi-public" development, to differentiate it from federal or commercial development. Page 65 of the Master Plan states "Recreation/Intensive Use lands are those allocated for developments as public use areas for intensive recreation activities, including areas for concession and quasi-public development." Thus, the terms "leased lands" and "quasi-public" are synonymous and, as noted on page 65, are classified as Recreation/Intensive Use. Therefore the area is correctly identified as Recreation/Intensive Use for the northern portion of the site where the proposed development would occur. The proposed lease site is not labeled Recreation/Intensive Use in the map set, Volume II of the 1977 Master Plan for Coralville Lake, but instead the area is labeled "Leased Lands" for the northern portion of the site and "Reserve Forest" for the southern portion of the site. However, "Leased Lands" labeling is consistent with Recreation/Intensive Use.

The shoreline adjacent to the proposed lease area is labeled "protected lakeshore" in the

Lakeshore

Management Plan, Appendix F of the Master Plan. The purpose of Lakeshore Management Plan is to provide guidance on limiting private exclusive use of the shoreline. Corps policy requires a balance of resource protection and the promotion of safe, healthy use of the shoreline for recreation by the public. The proposed beach construction by adding sand to an existing sandy shoreline and placement of a summer canoe dock, which will be removed during the non-camping season, were evaluated in the Environmental Assessment. No significant environmental impacts were identified from these actions. Therefore, the integrity of the shoreline would not be compromised and these actions are within the allowable parameters of the Lakeshore Management Plan and the proposed nonprofit lease.

which used

The Natural Resource Inventory System (NRIS), now obsolete, was an internal resource tool,

different labeling systems than the Master Plan. In addition, the NRIS was an inventory resource tool and not used to determine land use. All planning documents at Corps projects are guided by the project's Master Plan. If there is any perceived conflict in land use designations, the Master Plan land use designations predominate.

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6-2 Are there other available sites designated for this type of high-density development within the federally owned lake area that meet the criteria for the MYCA camp?

The Corps evaluated other potential sites at the Coralville Lake Project designated for Recreation/Intensive use or as leased lands. The former Camp Daybreak site was identified as the best site for accommodating the MYCA proposal. Other areas were eliminated because of higher natural resource impacts or not meeting the other evaluation criteria.

GP98

6-3 Why would the Corps approve such a large facility in an area originally designated in the master plan as a low impact area?

The land use designation for the northern portion of the Camp Daybreak site, where the development is proposed, is Recreation/Intensive Use, as described in Corps' 1977 Master Plan. This plan does not describe specific site density requirements, though the Corps must approve all plans for development. The proposed development of this site by MYCA is for nonprofit group use only and is appropriate at this location, based on the Master Plan land use designation. The camp sizing is based on environmental sustainability, carrying capacity, and design factors.

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6-4 The Master Plan is outdated. The area has experienced considerable residential development since the original planning conducted by the Corps. Does the Corps "Master Plan" consider the changes that occur over years on property adjacent to federal land? Does it make sense to have an intensive-use recreational development within a couple hundred feet of private homes? If this is not considered, why not?

The 1977 Master Plan for Coralville is the valid, approved plan for the long-term development and operation of Coralville Lake according to its Congressionally authorized purposes. Master plans consider the changes in the area, region, and nation when they are developed or updated, and designate appropriate land use. The Master Plan zoning and intended land use pre-dates the housing development and has been consistently applied since the inception of the project. The development of the Master Plan included coordination and review with local governmental bodies. It is a public document available to all interested parties, including developers and private individuals. Many housing developments have been developed around Rock Island District flood control reservoirs due to the attractiveness and values created by the project rather than the reverse. Current, existing conditions, including the impacts on existing homes adjacent to the federally owned Camp Daybreak area, were evaluated in the Environmental Assessment. This is also considered in the decision to lease the property.

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6-5 The Master Plan does not provide reasonable notice to the public and neighbors regarding uses proposed as outlined in the EA.

The Master Plan is a public document and has been available for many years for public review by any interested party. The land use designation has not changed and no changes are proposed. Prior to this Environmental Assessment action, the public has expressed little interest in reviewing the Master Plan. Any revisions to the Master Plan would include local input. The Master Plan has no provisions for public notice for implementation of previously approved land uses. See comment 29-6 for public notification information.

GP62

6-6 The project is of such size and nature to be a commercial venture contrary to any projects ever allowed on the Coralville Reservoir.

MYCA is a nonprofit organization as designated by Iowa Code. The prime purpose of the camp and the facilities, which support the camp, are to serve youth activities. The object, in this case, is not to make a monetary profit. Commercial ventures are permissible at Corp water resource projects for facilities such as marinas, campgrounds, restaurants, hotels, etc. Current commercial leases at Coralville Lake include a marina and a campground.

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6-7 Why did the Corps not update their own Master Plan before taking on a project of this magnitude?

No change to the current Master Plan's land use designation for the Camp Daybreak site was proposed for this action. The proposed use of the site is consistent with the land use designation of the area. In addition, the MYCA proposal is not significantly different from the previous use of the site. Therefore, no update of the Master Plan is deemed necessary at this time.

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6-8 What is the "Master Plan"? How does the current proposal meet the requirements of that plan?

Master planning is a process of establishing a framework within which development can occur over a period of time. Federal law requires that land and water areas of the Corps of Engineers' projects shall be administered and managed, to the extent compatible with the operation of the project for its primary purposes, so as to obtain maximum public benefits from the natural resources. Since the creation of the project in 1958, lands have been made available for nonprofit organizations under a lease for recreational purposes. The Coralville Lake Master Plan, beginning with the original plan in 1961, allocates lands for nonprofit recreational use. In the most current version of the Master Plan for Coralville Lake (1977), the Camp Daybreak site is designated 'Leased Lands', reflecting the use of the site by the Girl Scouts. This use is also described on pages 29 and 65 of Volume 1 of the Master Plan. The current proposal meets the land use as described in the Master Plan.

GP44

6-9 The proposed site is not consistent with the former use of the site as a Girl Scout camp. The new site has an increased number of users, a larger lodge structure, additional facilities, additional parking, and a greater increase in weekend use.

Though the proposed use and physical footprint of the Camp Daybreak site under Alternative 1 varies from the previous use by the Girl Scouts, it is consistent with the Master Plan, the land use designation of the site, and the previous use of the site. Please refer to the Environmental Assessment, Section 2.1 for a description of the Girl Scout facilities.

The 1970 annual report from the Cardinal Council of Girl Scouts documents revenues from 500 day campers and another 450 girls utilizing the area for troop camping on weekends, including during the winter. Records from 1973 document 1610 day campers and 973 weekend users. Finally, records from 1974 document Girl Scouts attendance of 841 for weekend troop camps, 64 for summer troop camps, 199 for summer day camps, 166 for day use, for a total of 1270 people. In addition, during 1974, Camp Daybreak was utilized by other groups including Camp Fire Girls, Mennonite Youth, Latter Day Saints, Tri-Parish Religious Youth, Boy Scout Troops, and several area school groups, for a total of 385 people.

G5
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GP87

- 6-10 Has the Corps established identifiable usages for the 106 acres? If so, what are they? How was this usage determined (methodology, comparative data, etc.)? If the Corps has not made this determination, why not?**

The northern portion of the tract is zoned Recreational/Intensive. The southern portion is zoned Reserve Forest. Intensive recreational activities are camping, picnicking, boating, and swimming. Facilities such as lodges, cabins, boat ramps or beaches to support these activities are also permissible. Commercial concessions and quasi-public development, such as MYCA, fit this category of land use. MYCA's proposed activities such as camping or boating are appropriate in the northern portion of the site. Appropriate uses for the southern tract are low-density recreational activities such as hiking, birding, and fishing, where the activities are less dependent on structural support. In addition, lands zoned for Reserve Forest are subject to vegetative prescriptions to support management objectives. This usage and zoning was determined based on a variety of factors and evaluation to include but not limited to: soils, slope, resource sustainability, Corps recreation and land management policy, and public and agency review.

GP44

- 6-11 Has the Corps established usages not considered appropriate for the 106 acres? If yes, what are they, and how were they determined? If not, why not?**

Some uses are not appropriate to Reserve Forest land. Intensive recreational development, including beach development and boat docks, would not be permitted in the southern portion of the tract unless the development was reviewed, evaluated, and approved by the Corps. Agricultural use is generally not permitted in either land use category unless the activity fosters management objectives such as open space, scenic values or creation of specific habitat types.

GP44

- 6-12 This land was condemned by the federal government because it was needed as part of flood control for the Coralville Reservoir. Why is it now suitable for multi-million dollar developments?**

Authorized uses for reservoir lands include flood control, recreation, and fish and wildlife management. All proposed development is located above the regulatory floodplain limit of 713 feet mean sea level. All habitable structures are located above the 1993 flood elevation of 716.75 feet msl.

GP44

- 6-13 How does the Corps justify alteration, bordering on elimination, of 106 acres of environmentally protected land for use as a 9 month adult conference center which would better fit in an urban location to accommodate parking, restroom facilities, water needs, etc.?**

The estimated ground disturbance of Alternative 1, based on the MYCA proposal, is approximately 4.8 acres, less than 5% of the 106 acres. The northern portion of this site, where the development is proposed, is designated as Recreation/Intensive. The southern portion of the site is designated Reserve Forest and is appropriate for trail development, as proposed. The area is not designated as "environmentally protected". Please refer to comment 33-14 for a discussion regarding an alternate urban location.

GP44

- 6-14 It appears the EA misinterprets the land use designation for the site in the 1977 Master Plan Volumes 1 and 2 due to poor quality of the PDF version.**

The land use for the Camp Daybreak site has been interpreted correctly. Please see comment 6-1 for an in-depth discussion of Corps land use designations.

GP20

- 6-15 Your lease clearly designates the lease boundary going to elevation 696. Any proposed construction or use below that level is off the easement rights. Water and shore use at the normal summer pool elevation of 683 must be prohibited and should not be a part of the overall plan.**

No lease for the proposed use of the former Camp Daybreak area has been completed at this time. A sample lease is included as Appendix D of the Environmental Assessment. All land to be included in this lease is owned in fee title by the federal government; no easements are involved. Water and shoreline use of the area will be allowed under terms and conditions of the lease. Please refer to question 6-1 for information regarding the Lakeshore Management Plan.

GP96

- 6-16 The proposed use includes dramatic buildings of design, materials and size that are out of place for the site. This is contrary to the old Master Plan.**

The Coralville Lake Master Plan does not mandate building design, materials or size. Conceptual designs for Corps facilities are included in the Master Plan. All proposed development at the Camp Daybreak site must be approved by the Corps prior to construction. In addition, Johnson County must issue a building permit prior to construction.

GP86

- 6-17 The proposed use, specifically the commercial oriented conference center, appears to be something other than outdoor recreation.**

The off-season rental and availability of the facilities to other nonprofit groups for retreats, weddings, and other nonprofit activities does not constitute a commercial venture. Corps policy does not restrict such rental of nonprofit facilities on Corps' leased land; however, all such activities must be within the parameters of the lease agreement. Many of the elements of the proposed use as discussed in the EA – hiking, swimming, boating, outdoor education, and interpretation, etc., are outdoor and water resource related activities. Thus, they are appropriate uses.

G2

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GP42

GP86

GP87

- 6-18 Alternative 1 is not consistent with a goal to manage resources "in their natural state.." or it is not consistent with previous use (32 campers for a few weeks vs 200 campers or visitors year round). The site is not consistent with any other development on the lake.**

The Master Plan was developed to balance recreation use of project lands with other uses, including natural resource management and flood control. The northern portion of the Camp Daybreak site is designated as Recreation/Intensive. Development of the proposed youth camp facilities is appropriate for this area and is consistent with the land use designation identified during the Master Plan development. The southern portion of the site is designated Reserve Forest; development of trails in this area is consistent with this land use designation and historic use patterns. See 2-12 for information regarding the breakdown of Coralville Lake project land use by category. See 6-9 for information of past use of Camp Daybreak.

GP18

- 6-19 The EA states that the Coralville Lake area provides a number of recreational opportunities for the surrounding communities and for the region at large. This seems to be in contradiction with section 1.2 of the EA where it states a need for nonprofit groups to have locations where they can participate.**

Coralville Lake provides many recreational opportunities at areas managed by the Corps, non-federal agencies or private concessionaires. However, no opportunities for nonprofit group use are currently available at Coralville Lake.

GP96

- 6-20 I must respect the history of land use on the site and the Master Plan, whether or not I agree with it.**

Comment noted.

G5

GP75

- 6-21 The Corps Master Plan is not consistent with the County's Land Use Plan or the North Corridor Plan.**

The 1998 Johnson County Land Use Plan states on page 3 that 'State and federal lands in Johnson County are exempt from county zoning.' The land use designations and historic use of the Camp Daybreak site predate the County's 1998 Land Use Plan and the 1996 North Corridor Land Use Plan.

G5

7 Corps Policy

- 7-1 What are the "national objectives" (referred to on g. iv) with which the land use decisions need to be consistent and compatible, according to Corps policy? What document containing these objectives is available to the public? Is there a specific national directive for the Corps to provide sites for wedding receptions?**

The national objectives of the Corps recreation programs and facilities at civil works water resource projects are:

- (a) To provide a quality outdoor recreation experience which includes an accessible, safe and healthful environment for a diverse population,
- (b) To increase the level of self-sufficiency for the Corps recreation program,
- (c) To provide outdoor recreation opportunities on Corps of Engineers administered land and water on a sustained basis, and
- (d) To optimize the use of leveraged resources to maintain and provide quality public experiences at Corps water resources projects.

To accomplish these objectives, the Corps manages land and water resources in cooperation with other federal, state, and local agencies, quasi-public organizations and the private sector. These objectives and the Corps outdoor recreation mission statement can be found in Engineering Regulation (ER 1130-2-550), chapter 2, on the Corps HQ website.

There is no national directive prohibiting wedding receptions at Corps projects. Wedding receptions are permissible wherever the facility is capable of accommodating the use in an accessible, safe, healthful way.

GP61

- 7-2 Feelings have surfaced which include a negative image and lack of confidence in the Corps.**

Planning for Corps project lands is based on national and regional needs and objectives, in addition to local needs. The concerns of the local communities and individuals are important and will be considered in the decision making process for the proposed lease of the former Camp Daybreak site. The Corps is obligated to implement projects on Corps' managed lands that benefit all segments of the public.

GP64
GP95

- 7-3 Are there plans to submit this lease request to a higher authority for review and approval?**

The Rock Island District has the authority to grant leases to nonprofit organizations for recreational purposes.

GP64

- 7-4 How can importance of the youth camp override the homeowners privileges who lived on the land bordering the lake for years?**

This area has been designated for nonprofit group recreation use in the Coralville Lake Master Plan beginning in the early 1960's and was previously leased and used for that purpose from 1966 to 1991. This type of use is not something new to the area and precedes much of the residential development that has occurred in the area.

GP24
GP64
GP74

- 7-5 If this project goes through as proposed, what plans do you have in place to deal with the other leased land along Coralville Lake that may want to develop their lake fronts in a similar manner?**

There are currently no other leases to nonprofit organizations for recreational purposes on land at Coralville Lake managed by the Corps of Engineers. The Corps would not consider proposals for such development on lands that are not designated in the Master Plan for uses compatible with such development.

GP27

- 7-6 According to the EA, on page 1 it says the "Corps administrative policy requires that land use decisions should: provide the best possible combination of responses to regional needs, resource capabilities and suitability, and expressed public interests and desires consistent with authorized project purposes." The county fails to see where that is being achieved, especially with regards to resource capabilities of the County.**

Recreational land use decisions should be responsive and compliant with Corps policy. Corps policy encourages the maximization of public use on federal lands where such use meets regional needs to a level sustainable within the environmental context and manageable within manpower and budgeting limitations. Appropriate development of a suitable site by non-Corps entities increases the recreational opportunities available to the general public at minimum federal expense. A youth camp at Coralville Lake serves a need and broadens the type of recreational and education experiences available within the region and provided at the project. The County receives economic benefits from the Corps project in several ways: payment in lieu of taxes, percentage of income from various types of leases, law enforcement contract, increase in property values, employment opportunities, local recreation, and tourism.

G5
GP96

- 7-7 Knowing how protective the Corps has been to the waterfront and forested areas of the lake, approval of the lease is inconsistent with the treatment and restrictions placed on adjacent property owners.**

Adjoining property owners have no rights or privileges to use federal lands beyond those rights and privileges granted to the public. The proposed lease for development of a nonprofit group recreation area is in keeping with the Master Plan for the project and will provide additional recreational opportunities available for nonprofit group use within the conditions and terms of the lease.

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- 7-8 In the past the Corps has advertised land to be leased and has implemented a competitive bid process. Has this procedure been followed in the proposed lease of Daybreak land?**

Corps regulations do not require competition to grant leases for recreational use to nonprofit organizations.

GP2

- 7-9 Who is legally responsible for damage done on private property? What recourse will adjacent property owners have (the Corps currently fines homeowners if they mow a path on federal property) when there is damage done, or when trespassing is a problem.**

Damage to private property is the responsibility of whoever causes the damage. Matters of private property damage or violations of local laws and ordinances should be reported to the local law enforcement authorities.

GP44
GP57

- 7-10 Public property should not be restricted to private use.**

The leasing of this site as a nonprofit group recreation area is not considered private use. The lease provides that the lessee is to make the site available to other nonprofit groups when not scheduled for use by the lessee organization. This will provide a higher level of recreational use than the site provides in its current state and the overall opportunities for recreational use is increased by providing an area that is developed and managed for organized group recreation activities. This site will serve another segment of the recreating public.

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- 7-11 If this area is to be deforested for recreation, why did the Corps do a TSI (Timberstand Improvement) project about ten years ago? What effect will this proposal have on that expense and project?**

Approximately 5 acres out of 106 will be impacted by the proposed construction. The timber stand improvement was done to improve the overall timber quality on the site. Much of the work was not in the areas that had been developed previously or that are planned for development under the new lease proposal. The timber stand improvement work was primarily to thin the overstory vegetation.

GP44

- 7-12 Concerning the answer in FAQ section of the Corp's Daybreak website and the criteria for selection of a lease holder. How was MYCA selected for a lease with no experience and only \$5,000 as total assets?**

Experience and financial capability are among the factors considered in selecting the proposal. The MYCA directors have significant business management experience and indicate significant potential funding sources. The committee evaluating the proposals found the proposal by Muslim Youth Camps of America to be the best overall proposal for development and use of the area.

GP52

- 7-13 The U.S. Corps of Engineers Regulatory Program Goals include (as one of three goals): "To provide strong protection of the Nation's aquatic environment, including wetlands." How does this proposal further that goal?**

Wetlands on the Camp Daybreak site were identified by a Corps Regulatory wetland biologist. Only one forested wetland area would be impacted by the proposed plan. Shifting the trail and relocating one tent platform will avoid impacts to this wetland. The proposed beach construction will impact 0.2 acres of deep-water wetland, however, no significant impact to aquatic resources is anticipated. The proposed beach would require a Department of the Army permit under Section 404 of the Clean Water Act prior to construction.

GP44

- 7-14 What is Corp philosophy/goals on preserving open/green space for the public?**

The Corps outdoor recreation mission statement is as follows:

"The Army Corps of Engineers is the steward of the lands and waters at Corps water resources projects. Its Natural Resources Management Mission is to manage and conserve those natural resources, consistent with ecosystem management principles, while providing quality public outdoor recreation experiences to serve the needs of present and future generations.

In all aspects of natural and cultural resources management, the Corps promotes awareness of environmental values and adheres to sound environmental stewardship, protection, compliance, and restoration practices.

The Corps manages for long-term public access to, and use of, the natural resources in cooperation with other Federal, State, and local agencies as well as the private sector.

The Corps integrates the management of diverse natural resource components such as fish, wildlife, forests, wetlands, grasslands, soil, air, and water with the provision of public recreation opportunities. The Corps conserves natural resources and provides public recreation opportunities that contribute to the quality of American life."

Open space/green space values are balanced within the Corps' mission to provide multiple resource objectives such as natural resource management, flood control, and recreation.

GP44

7-15 Development of the camp on the lakefront is in conflict with Corps goals of maintaining a natural look and limiting development solely for lake views.

The Corps policy is to balance multiple uses. See comment 7-14. The northern portion of the land is zoned for recreation intensive use. Camp and lodge development is consistent with that zoning. Building and site design will be evaluated in the lease process to encourage compatibility with the natural environment.

GP27

7-16 Granting of a lease to MYCA on Corps property violates the separation of church and state. Are religious ceremonies allowed in public lands?

The MYCA proposal does not violate the First Amendment to the United States Constitution. The First Amendment prohibits the Federal Government from both establishing religion and interfering with its free exercise. Neither would occur with the MYCA proposal. The grounds for selection of the MYCA proposal were neutral with regard to religion. The camp will be open to youths of all denominations, as will the facilities, when not used by MYCA. MYCA does not intend to hold regular religious services at the facility, but such services on Federal land are not prohibited by the First Amendment and do occur at other locations, such as National Parks. Daily prayer is an integral part of a practicing Muslim's life, and those campers interested will be able to pray in a room at the camp. This is constitutionally permissible. Persons of all faiths are free to pray whenever they choose on public land. While the proposed tower is influenced by Muslim architecture; it is not a mosque and simply reflects the culture of the group.

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7-17 The permanent closure of this resource to a private, religious group violates the Establishment Clause. MYCA has clearly stated that they will not be able to allow public access to the site.

The proposal does not violate the First Amendment's Establishment Clause. While MYCA's founders are associated with a particular religion, its purposes and activities at Coralville will be secular in nature. By its very nature, a lease allows a lessee certain rights to exclude the use of the property by others. MYCA will not, however, be able to restrict use or discriminate on the basis of religion. Please refer to comments 2-5, 3-3, 3-10, and 7-10 for more regarding public access.

C1
GP39

8 Soils and Geology

8-2 Who would be responsible for minimizing erosion from parking lot, roof, and village runoff?

The lessee of the site will be responsible for obtaining a National Pollutant Discharge Elimination System (NPDES) permit through the Iowa Department of Natural Resources (IDNR). The NPDES permit outlines procedures to be used on site during construction to control erosion and stormwater runoff. The permit requires preparation of a stormwater pollution prevention plan. The plan will identify areas which have a high potential for significant soil erosion and identify measures to limit erosion.

GP27

8-3 It seems that no impacts to the geology of the site would occur.

As stated in the Environmental Assessment, minor impacts are expected to occur during site development, but no lasting impacts to geology are anticipated.

G5
GP75

- 8-4 I did not necessarily agree with the findings regarding impacts to soils. I feel that construction of roads, parking areas, buildings, and other infrastructure will probably create "significant" erosion potentials. With high erosion potentials come high potential for offsite delivery of sediment to Coralville Lake. The report statement that erosion will be controlled I suspect that what was meant was "sediment will be controlled."**

Erosion controls will be implemented on-site by the lessee to limit the potential for sediment run-off into Coralville Lake as well as throughout the 106-acre tract and adjoining properties. Please see responses to comments 8-2 and 8-3.

G5
GP75

- 8-5 Erosion can be reduced and sediment delivery controlled by the preparation of an Erosion and Sediment control plan. This plan should be developed, implemented and maintained through the construction period. The goal should be zero discharge of sediment.**

The EA states that best management practices be utilized during construction including silt fences, construction planning, straw bales, and revegetation. Please see response to comment 8-2.

G5
GP75

- 8-6 As of March 2003 a NPDES permit will be required from the Iowa Department of Natural Resources.**
Please see response to comment 8-2.

G5
GP75

- 8-7 The soils of this site have great potential to store and allow infiltration of rainfall. Because of these potential benefits, I find it of critical importance to protect and enhance soil resources on this or any development.**

Please see response to comment 8-2.

G5
GP75

- 8-8 Measures to protect and enhance soil include: protect from compaction, enhance soil to increase infiltration, and ensure healthy community of native vegetation.**

Best management practices according to the IDNR approved NPDES will be implemented by the lessee to prevent soil erosion during construction of any buildings or operation of activities on the site. Please see response to comment 8-2.

G5
GP75

- 8-9 The rise and fall of the river will carry the sand from the beach into the river. This will fill in areas of the river that are already low.**

As noted in the EA, it is anticipated that beach construction would require the issuance of a Section 404 permit from the Corps Regulatory Branch and a Section 401 Water Quality Certification from the State of Iowa. Given the size of the proposed beach area, .2 acre, it is not anticipated that deposition of sand from this area will cause appreciable sediment loading in the lake. Beach erosion is currently not considered to be a problem at the lake.

GP33

- 8-10 This land is steeply sloped and erosion is already a problem without removing acres of trees and vegetation.**

Approximately 4% of the site is being proposed to be disturbed Alternative 1. Measures will be taken in this area to prevent erosion during construction and operation. Please see responses to comments 8-2 and 8-8.

C1

- 8-11 With the extent of modification planned to the site, what plans will be made for erosion control?**

Please see response to comment 8-5.

G5
GP27

GP44

- 8-12 Mass grading and random traffic patterns - typical of most construction sites - create significant and lasting impacts to the soil resource. I was not comfortable with terms like "localized erosion" and "minor impacts" and "no lasting impacts" for soil resources.**

Please see responses to comments 8-2, 8-8, and 8-10.

G5

GP75

9 Terrestrial Ecology

- 9-1 The Environmental Assessment states that 403 trees will be removed. The 1999 plan stated that 12 oaks and 15 other trees larger than the 16" DBH would be removed. Now it appears that more of the 403 trees would be of this size.**

The location of some of the buildings proposed in Alternative 1 was modified from MYCA's 1999 proposal due to findings from field surveys. Until final design is completed as part of lease negotiations, the absolute number of trees to be removed will not be known. The analysis in the EA shows that tree loss would result in minimal impacts to forested land. MYCA has proposed relocating trees during construction, where possible, to minimize tree losses.

GP36

GP40

- 9-2 The constant human presence and possible security fencing will displace wildlife into the neighborhood and roads.**

Security fencing was not included in the proposed plan submitted by MYCA. Wildlife displacement has occurred in recent years due to residential development on the peninsula. Further wildlife displacement may occur as a result of development on the site, however, only approximately 4% of the site would be developed. Most of the site will remain as forest cover, and forest habitat will be maintained.

C1

- 9-3 The project will result in the destruction of 400 trees and natural habitat which has a negative environmental impact. If the Corps allows the habitat to be destroyed it can never be restored.**

The preferred alternative would result in development on approximately 4% of the 106-acre tract. Development in this area would require impacting approximately 5 acres of forested land. This area would be converted from forest land to parking lots, structures, lodges, trails, beach areas, and wastewater treatment. The area proposed for development is in approximately the same area as was occupied by the Girl Scout Camp. If the lease is terminated, the lessee would be responsible for removing any improvements and restoring the lease area.

C2

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- 9-4 Animal displacement needs to be reviewed as a cumulative impact.**

As stated in the EA, the expansion of residential development in the area and on the peninsula has and will continue to contribute to habitat loss. Animal displacement will result from habitat loss. Approximately 5 acres of the 106-acre site are proposed for development in a previously disturbed area. This does not constitute a significant contribution to cumulative impacts related to habitat loss in the area.

GP18

9-5 The broadwing hawk and pileated woodpecker are known to occur in the area.

Comment noted. The EA addresses nesting habitats of the broadwing hawk in Section 5.1.2. Because of the distance of the project site from the nest area, the nature of the intervening land use (i.e. residential), and the abundance of other suitable woodland habitats within the region, no significant impacts to this species are anticipated with any of the project alternatives.

GP79

9-6 Due to parking requirements and fire and safety needs, it is likely that the actual destruction of upland forest will be significantly greater than what is projected in the MYCA proposal.

Developed areas under Alternative 1 will comprise approximately 5 acres, or about 4% of the 106-acre site. This includes areas for parking and fire and safety needs.

GP62

9-7 The EA incorrectly places the location of the osprey nest and does not have the most current status information of the osprey nest near the former Camp Daybreak.

Figure 4-2 was provided for graphical representation of area features. Coordinates for osprey nest locations were obtained from Corps park rangers. The Corps has been in partnership with the IDNR since 1997 in implementing the Osprey Plan for Iowa at certain locations on Corps property including Coralville Lake. Other agencies including private wildlife centers, primarily the Macbride Raptor Project, private citizens and organizations, and the U.S. Fish and Wildlife Service are also partnering with IDNR to implement this plan.

C1

GP18

GP19

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GP79

GP96

9-8 MYCA has no qualifications and training to determine the number of trees that would need to be removed from the site. The use of data from unqualified sources lends no credibility to the EA. Since a detailed set of construction plans and specifications is not available, it would be difficult to assess the total extent of tree loss and associated habitat.

In their 1999 proposal, MYCA provided a comprehensive list of trees, by size and species, located in the footprint for the proposed development. MYCA hired MMS Consultants, Inc. to perform the tree survey. The proposal does not include detailed design plans, therefore, the EA used these numbers as a reliable estimate of tree removal in the footprint to estimate potential impacts from the alternatives. Field investigations were used to confirm the general area and density of tree cover.

GP53

9-9 The EA fails to indicate whether any avian surveys have been completed on the site.

Avian surveys were not completed on site as part of the EA analysis. Existing research and publications, correspondence with natural resources agencies, and a field review were used to determine impacts to terrestrial resources. Specific information relating to osprey nest locations and the ongoing Osprey Plan for Iowa was considered in the analysis.

NGO1

9-10 Construction, use of the site by campers, and creation of trails will fragment habitat that is used by neotropical migrants.

As stated in the EA, because the amount of woodland that would be converted is very small (with regard to the project site and Coralville Lake area), and is generally confined to an area of the site which has been previously disturbed, no significant impacts to migratory birds are expected to occur with any project alternative.

G5

NGO1

9-11 What effect will this development have on the Raptor Center programs? Has the Raptor Center been contacted? If not, when?

The Raptor Center was contacted during the preparation of the EA and comments were received from them. Overall programs administered by the Center would not be affected by any of the proposals. No development under any of the alternatives would be allowed near the osprey nesting platforms. Onsite activities would not be located any closer to the nesting platform at the Daybreak site than are other human activities to nesting platforms located elsewhere around the lake.

GP44

9-12 The EA lists of species does not include a rare trillium that occurs on site. In addition, the EA lists pawpaw as occurring on site, which is considered rare in this part of Iowa. These two observations indicate a more detailed study is needed on site.

Please see response to comment 9-26.

NGO1

9-13 Has the Iowa Department of Natural Resources been contacted with regard to rare plants being found within 5 miles of the site? Have permits for the project been requested from the IDNR?

The IDNR was contacted regarding threatened and endangered species that could be affected by the project.

They notified Zambrana Engineering that they had no records of rare species or significant natural communities at the site. They suggested that the EA address muskroot, running pine, crowfoot, clubmoss, and showy lady's slipper since the site had not been cultivated and these rare plants have been found within a five-mile radius of the site.

Any required permits from the IDNR will be requested after final design and prior to development.

NGO1

9-14 How many trees will be removed?

Table 5-2 in the EA provides an estimate and summary of the number of trees that would be impacted under each alternative. The absolute number of trees to be removed will not be known until final design plans are completed and approved by the Corps.

GP44

9-15 What will be the effect on eagles, herons, owls, deer, foxes, hawks, wild turkey, orioles, woodpeckers, songbirds, etc? This is a breeding and feeding area for them and many more species.

Please see responses to comments 9-4, 9-5, and 9-10.

GP44

GP67

9-16 What will be the effect on the weeping trillium and any other rare species found in the area?

Please see response to comment 9-26. Most of the proposed development utilizes the same footprint as the former Camp Daybreak, minimizing the impact on previously undisturbed lands. The Iowa Department of Natural Resources did not express any concerns for any additional species other than those listed in the section 4.2.5 of the EA.

GP44

9-17 How will the EA take change of seasons into account? The fauna/flora of the area changes drastically dependent on the season.

Fauna and floral species were evaluated in the EA regardless of seasonal changes. The seasonal timing of a species' occurrence does not make a difference in consideration of possible threatened and endangered species.

GP44

9-18 Land disturbance during construction creates a possible location for invasive species and noxious weeds. Who will manage the property with respect to invasive weed and tree species?

The lessee of the site will have responsibility to manage the site in regard to invasive or noxious plants.

G5

9-19 Techniques that minimize disturbance to the tree root system should be implemented during construction.

Best management practices to preserve remaining trees on site during construction would be included in the lease Development and Management Plan approved by the Corps.

G5

9-20 If mitigation measures require the replacement of every removed tree with high quality native hardwoods, and if part of the mission of the camp is teaching environmental stewardship, the benefits could offset the losses in the long term.

Comment noted. MYCA has stated that all appropriate trees, impacted by the proposed development, will be relocated when and where possible.

G5

9-21 The impact of tree removal on bird and mammal populations on this small site, which was previously disturbed, appears to be of minimal consequence.

Comment noted. Please see responses to comments 9-3 and 9-10.

G5

9-22 It is difficult to comprehend that the removal and destruction of 403 trees bears no significant impact.

Please see response to comment 9-3.

GP87

9-23 The site is currently in need of restoration based management.

Please see response to comment 32-3.

G5

GP75

9-24 The site would be enhanced with green development and restoration based management.

Please see response to comment 32-3.

G5

GP75

9-25 MYCA's planned deviation from the existing Girl Scout footprint will make the tree removal estimate in the EA invalid.

Please see responses to comments 9-8 and 9-14.

GP61

9-26 Comments from previous letters concerning issues over plants were not noted in the EA

The public comments received during the public scoping were categorized by general issues. Those that were to be addressed in the EA were listed as such in the Content Analysis Report Summary. See response to comment 29-7.

The possibility of threatened and endangered species was addressed in Section 4.2.5 and tables were presented showing State and Federal species and species of special concern that could occur in the area including the cerulean warbler, Indiana bat, bald eagle, and several other plant species. The IDNR responded that there would be no impacts to threatened or endangered species if areas, where protected plants may exist, are not affected by construction or visitor use. However, a site investigation for threatened and endangered species would be conducted after final design is completed, but prior to construction.

NGO1

9-27 The EA states that timber rattlesnakes might be one of the species occurring at the site, but does not recognize that the most common species is brown snake. There are no timber rattlesnakes in Johnson County.

According to sources used in the EA, including the Peterson Field Guide for Reptiles and Amphibians, the timber rattlesnake occurs in southern Iowa, and, therefore, could occur at the site.

GP36

10 Aquatic Resources

- 10-1 Impacts to aquatic ecology will be significant without green development. Improper storm water management is a significant impact on any development site.**

The lessee will be responsible for obtaining a NPDES permit from IDNR for stormwater discharge and erosion control. Please see response to comment 8-2. Techniques to properly manage stormwater that minimize impacts to the surrounding land and aquatic resources will be included in a stormwater pollution prevention plan to be approved as part of the NPDES.

G5
GP75

- 10-2 The construction of the proposed beach will have significant environmental impacts by dumping massive amounts of sand, by compaction due to heavy equipment and by the construction of an access road if needed.**

Please see responses to comments 8-9 and 30-7.

GP36
GP87

- 10-3 I have no substantial concerns with the proposed lease and its effects on aquatic ecology, or threatened and endangered species. Both criteria should remain mostly unaffected other than destruction of shoreline habitat. I don't think that the fishery will be negatively impacted to a major extent.**

Comment noted.
G5

11 Wetland Resources

- 11-1 If alternate siting of facilities could protect disturbed wetlands, it should be encouraged. Mitigation of wetland disturbance elsewhere may be a viable alternative on the lease.**

Based on the preliminary proposed site plan, the EA states that Alternative 1 would impact one tenth of an acre of wetland, but that impacts could be avoided by shifting the trail and relocating a tent platform. Arrangements to avoid this wetland impact could be part of final lease negotiations. Please see response to comment 7-13.

G5
GP75

- 11-2 Wetland area would benefit from the restoration of an infiltration-based, groundwater-driven hydrology on the site.**

Comment noted.
G5

12 Threatened and Endangered Species

- 12-1 The Environmental Assessment notes the presence of many endangered species on the land, but states there will be no impacts.**

Please see response to comment 12-2.
GP67
GP68

- 12-2 The EA notes the presence of suitable habitat for many species (bald eagle, broadwing hawk, Cerulean warbler, showy ladies slipper, running pine, etc.), but no reference is made to the means used to identify and avoid these habitats.**

Suitable habitat for endangered species was evaluated using information from the U.S. Fish and Wildlife Service (USFWS) and other published literature on species that could potentially occur in the project area. A comparison was then made based on the species preferred habitat and the habitat at the project site. Sightings of the species in the general area were also considered during this process. If the two habitats were compatible, an evaluation was made to determine if the loss of this habitat was significant in terms of the uniqueness of the habitat and the size of the impact. The USFWS (comment 31-16) has concurred with the finding that no federally threatened and endangered species will be negatively impacted by any of the alternatives. The Iowa Department of Natural Resources has recommended a survey for running pine, a state-listed endangered species, be conducted within areas of suitable habitat to be impacted by construction or use. This survey will be completed during the final site development planning stage.

NGO1

- 12-3 The Cerulean Warbler is currently under review for listing and the Corps has a responsibility to protect its nest.**

The cerulean warbler has been sighted in selected areas around Coralville Lake, but no records were found indicating that the species occurred at the former Camp Daybreak site. There is a potential that the species could be located within the area, but it was the determination of biologists at Zambrana Engineering and the USFWS (comment 31-16) that a project of this scope and size will not have a significant impact on this species.

NGO1

- 12-4 Several threatened and endangered species are mentioned in the report (e.g. ornate box turtle), but no determination is made to suitable habitat or to surveys efforts conducted on site.**

Threatened and endangered species included in Tables 4-6 and 4-8 have been known to occur in the general area of the Coralville Reservoir. The habitat for these species does not exist on the proposed lease site.

G7

- 12-5 It does appear that the eastern prairie fringed orchid, showy lady's slipper, muskroot, and crowfoot clubmoss do not occur in the area to be developed.**

Comment noted.

G7

- 12-6 Suitable habitat is listed for the running pine and surveys should be conducted within this suitable habitat prior to construction.**

While the general habitat characteristics for the running pine exist on the property no evidence has been found of the species' presence on the site. At the current time the exact location and placement of structures at the former Camp Daybreak site is not known, but it is anticipated that even if running pine is present on the site, the facilities and associated activities can be arranged in such a way as to eliminate impacts to this species. The Corps plans to coordinate with the IDNR regarding investigations of this species and may provide personnel for an on-site survey prior to construction of any facilities.

G7

- 12-7 The Indiana Bat may occur in the project area. If trees greater than 9 inches are to be cleared between April 1 and September 30 then habitat within the construction zone may need to be surveyed prior to construction.**

Care will be taken to minimize impacts to Indiana bats during any construction. The Corps is responsible for ensuring that tree removal occur during the period when bats are using their winter roosts and conducting a site survey to identify potential roost trees present in the construction area.

G5

G7

- 12-8 If protected species exist on the property but in areas not impacted by construction or visitor use, then the IDNR would have no concerns with the project.**

Comment noted. The EA concluded that there would be no significant impact from the project to threatened or endangered species or their associated habitat. The U.S. Fish and Wildlife Service has concurred with this finding (see comment 31-16).

G7

12-9 Were two field visits to the site enough to determine presence of endangered species and/or their habitat?

In addition to site visits, literature searches and consultation with resource agencies and the Corps were used to determine the presence of endangered species at the site. EA preparers researched and used published scientific data and reports. Two site visits, in combination with this research, were adequate to make the assessments in the EA.

GP61
GP65

13 Water Resources

13-1 Is there an official response from the Iowa Department of Natural Resources regarding a wastewater treatment variance?

Due to the preliminary nature of the lease application a variance from the Iowa Department of Natural Resources has not been requested at this time. Please see response to comment 3-14.

GP61

13-2 Operation and maintenance of a wastewater treatment system at the site is a major concern.

Operation and maintenance of a wastewater treatment facility at this site will require review and approval from the Iowa DNR. Only wastewater treatment facilities that meet state wastewater treatment and discharge standards will be allowed at this site. Please see response to 13-23.

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13-3 Are wastewater concerns the reason why the proposed plan is only partially compliant with the Clean Water Act?

Partial compliance indicates that the proposal has not met some of the requirements that are normally met in the current stage of planning. This is due to the preliminary nature of the lease negotiations and the fact that final design has not been completed.

GP61

13-4 If variances for the wastewater treatment system are approved for this site, what seepage controls will be put in place to prevent possible lake contamination?

The EA indicates that the proposed wastewater treatment facility would require a variance from the IDNR, in compliance with IDNR regulations, in order to be constructed. The EA also states that compliance with IDNR rules is an indication that there are not environmental consequences. The EA does not make an assumption as to whether a variance will or will not be granted. Please see response to comment 3-14, 13-2, and 13-23.

GP27

13-5 The facility will need a variance from the State to treat wastewater, and the EA assumes a variance will be granted and no environmental impacts or consequences will result.

Please see response to comment 3-14.

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13-6 The location of wells in the EA is inaccurate and one or more well locations are missing.

The wells shown on Figure 4-2 are in their approximate location. The well located north of the subject site is intended to show the approximate location of the community well. The location shown on the exhibit is appropriate given the detail of the map. Private wells not shown on this exhibit do not influence the analysis contained in the EA. Figure 4-2 is only a representation of the well locations. All wells were included for the analysis of impacts.

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13-7 Siltation and sedimentation should not be characterized as "localized." Any sedimentation adds negative impacts to the whole. Only through development that adds no negative environmental impacts on every site development, will water quality and flooding concerns be addressed.

Short term impacts associated with the construction phase are considered to be localized, in that the location of the impact is anticipated to be on-site, or immediately adjacent the site within Coralville Lake. Best management practices are intended to minimize these impacts. Please see responses to comments 8-2 and 30-7.

G5
GP75

13-8 The water treatment facility for Iowa City and the University of Iowa is potentially affected by the siltation and sedimentation on this site.

Best management practices will be employed to minimize siltation during construction. Appropriate detention structures will prevent appreciable impact to Coralville Lake during the operational phase of the project. These measures will minimize potential impact to the Lake overall, or to water treatment facilities in specific.

G5
GP75

13-9 Wellhead protection measures should be considered.

The proposed use of the well conforms to current regulatory standards. Additional wellhead protection measures would be considered during lease negotiations, if appropriate. Only wastewater treatment facilities that meet IDNR treatment and discharge standards will be allowed on this site.

G5
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GP75

13-10 Can you, by state/government standards, build/site/waste discharge on these slopes? This is not addressed in the EA.

Due to the preliminary nature of lease negotiations, detailed designs for site facilities have not been completed at this time. Therefore, the exact slope of the ground where the discharge would be located is unknown. As indicated in the EA, the final design of any wastewater treatment facility must be approved by the Iowa DNR.

GP96

13-11 The EA does not address the effect of the use of thousands of gallons of water a day on the aquifer.

Section 5.2.2 of the EA, Ground Water Resources, indicates that the well on the project site can meet the maximum demand for the development with no appreciable drawdown. Records for Camp Daybreak indicate that the well was tested in 1967, and, at a production rate of 20 gpm, there was no observable drawdown at the well (no cone of depression). In addition, this well draws from both the Devonian and the Silurian aquifers. The Silurian aquifer typically provides a better supply, however, the connection between these two aquifers provides additional yield beyond that of the Silurian aquifer. No significant impacts to neighboring wells is anticipated.

GP15
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13-12 The EA does not address the issues involved in placing a wastewater treatment facility on site.

Please see response to comments 13-4 and 13-10.

GP18

13-13 Alternate methods should be considered for sewage disposal. For example compost or incineration toilets, or holding tanks that are pumped out.

Should the aerated primary wastewater treatment facility not be approved by the Iowa DNR, alternate disposal methods may be considered.

GP33

13-14 The Lake has terrible water quality and should not be used to promote swimming and fishing. The site should be located where the children could have access to clean air and water.

A water quality monitoring program has been in place at Coralville Reservoir and the Iowa River since the 1960's. Implementation of soil conservation practices in the watershed have resulted in great improvements in suspended sediment levels entering the reservoir. As with most Iowa waters, the reservoir is susceptible to high nutrient loading, which can result in algal blooms.

The reservoir has been listed on the 2002 State of Iowa's 303(d) List of Impaired Waters for indicator bacteria. This is primarily due to high fecal coliform bacteria counts in the upper end of the reservoir following storm events. This becomes less problematic heading downstream towards the dam, as bacteria die-off and settle out. Widespread health problems from swimming in the reservoir have not been reported. The water quality of the reservoir supports primary contact ("swimmable") and aquatic life ("fishable") uses. However, following storm events in the Iowa River Basin upstream of the reservoir, short-term periods of impaired water quality may be experienced.

GP33

13-15 Request that the Corps suspend any decision regarding the EA and the MYCA lease until the IDNR has granted or rejected a variance for wastewater treatment at the site.

Please see response to comment 3-14.

GP12

13-16 The project will increase runoff and siltation which goes against the primary purpose for which the reservoir was built.

Please see response to comments 13-7 and 13-8 regarding siltation. The limited amount of siltation will not have a measurable affect on the flood control capacity of the reservoir.

GP36

13-17 Even with a variance, it is still almost impossible to locate a sewage treatment system, but the EA misrepresented the dimensions and the steep slopes of the site.

Figure 4-1, Soils of Project Area, illustrates the soil type and the slopes on the project site. The exhibit utilizes data obtained from the NRCS, is drawn to scale, and uses an aerial photo as a background. Additional topographic data from the USGS was utilized to determine potential locations for a potential treatment facility.

C1

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13-18 The EA incompletely and inaccurately accounts for water demand.

The water demand for the camp is based on full occupancy, and this computed demand is approximately thirty percent of the available daily output from the existing well, with no appreciable drawdown. The EA recognizes that consideration may be warranted to provide a non-potable fire protection system.

GP13
GP19

13-19 Since detailed a engineering plan is not available that locates for the wastewater treatment system and all its essential appurtenances, it is impossible to assess if a project of this magnitude is even feasible.

Lack of detailed design drawings does preclude determination of the exact location of the wastewater treatment system, however, the general magnitude and size of the system have been determined. These general size requirements were utilized to determine that reasonable locations are available to site the facility.

GP53

13-20 Johnson County Planning and Zoning staff feel its is not prudent to plan a development presuming that a variance will be granted. The variance should be applied for and granted before moving to the building phase.

The EA indicates that a variance will be required. This variance will be required prior to obtaining building permits. Please see response to comment 3-14.

G5

13-21 The EA indicates percolation test were performed; however, the location of the tests is not given The findings of the percolation tests in the EA are meaningless unless they are in the immediate vicinity of the proposed leach field.

Percolation tests were performed, and the tests indicated that soils were suitable for the proposed treatment facility. It is recognized that additional percolation tests will be required at such time as final design is completed and final location of the facility is proposed. The tests done to date simply reflect that there are suitable soils on site.

GP53

13-22 If private wells or private onsite water systems are used, the Johnson County Board of Health Regulations would need to be met.

Comment noted.

G5

13-23 The IDNR guidelines for siting treatment facilities are strict and have been strictly enforced for the protection of the public. The variance is directly at odds with the IDNR regulations. If the proposed project was in harmony with environmental regulations of IDNR, a variance would not be needed.

The provision for requesting a variance is an authorized procedure contained in the Chapter 64: Wastewater Construction and Operation Permits of the Iowa Administrative Code. Upon submittal of a variance request, IDNR will determine whether the requested variance is in compliance with these regulations. Only wastewater treatment facilities that meet IDNR treatment and discharge standards will be allowed on this site.

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13-24 Reduction of minimum separation distances to allow for a variance for a wastewater treatment and disposal facility would cause a significant impact to the environment.

If the IDNR determines that the proposed treatment facility causes significant impacts they have the authority to deny the request for a variance.

GP36
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- 13-25 A serious concern is that wastewater treatment facilities would not be required to meet local ordinances, which could potentially lead to severe pollution of the reservoir.**

New construction would comply with local building codes. As indicated in the EA, the final design of any wastewater treatment facility will need to be approved by the Iowa DNR.

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- 13-26 Negative impacts from impervious surfaces will impact groundwater recharge and resources.**

Please see response to comment 8-2.

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GP75

- 13-27 The Environmental Document assumes an occupancy of 136 campers and about 150 lodgers at the conference center at other times. There is not acceptable sewage for even these numbers of people, but earlier MYCA numbers have indicated a much higher use.**

Please see response to comment 13-4.

GP68

14 Floodplains

- 14-1 Development of the lodge and tent pads within the floodplain is a concern. Why does this not raise more of a concern with the Corps?**

No impacts to floodplains would occur with any alternative. All proposed development is located above the regulatory floodplain limit of 713 feet msl.

GP27

- 14-2 I concur with the finding of "no impact" for floodplains; all proposed development is above the floodplain.**

Comment noted.

G5
GP75

- 14-3 At what water level is the 106 acres measured? Are the proposed facilities located in the 100-year or 500-year floodplain? As a federal agency, why is the Corps of Engineers not avoiding development that occurs in or affects the floodplain (i.e. Executive Order 11988)?**

The 106-acre tract is measured from elevation 696 feet msl. As stated in Section 5.3 of the EA, development proposed at the site would occur above the regulatory floodplain and at an elevation above 716.75 feet which was the 1993 flood level. No encroachment upon the regulatory floodplain limit of 713 feet msl would occur with any alternative.

GP44

16 Land Use/Zoning

- 16-1 The use of the area for conferences, weddings, receptions, and retreats is commercial and does not comply with any land use plan of either the Corps or the County.**

The use of the area for conferences, weddings, receptions, and retreats is considered an accessory use to the primary use as a camp. These are uses that occur within campgrounds and public areas managed by the Corps. Please see responses to comments 6-6 and 6-17.

GP36

- 16-2 Land use designations are too general.**

Land uses designations reflect those classifications contained in the Coralville Master Plan, the Johnson County Land Use Plan and the Johnson County Zoning Map. The figures are only a representation of the land use. More details, such as home locations, were included for the analysis of impacts.

GP67

16-3 The MYCA proposal is incompatible with the Johnson County comprehensive planning document and current zoning.

As indicated on page 3 of the Johnson County Land Use Plan, State and Federal lands in Johnson County are exempt from county zoning. While the property is exempt from County zoning the proposed use can be considered a recreational use, which is a permitted use within the A3-Flood Plain District. This is a use that is consistent with the land use designation within the Coralville Lake Master Plan, originally approved in 1977. The County's subsequent zoning of land adjacent to the site as RS-Suburban District is considered compatible with this original land use designation for the subject site.

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16-5 Is the local zoning process applicable to the lessee of Corps land? If not, why not. (This 106 acres is currently zoned A3-Floodplain by Johnson County.)

Please see response to comment 16-3.

GP44

16-6 If the lessee is exempt from any local ordinances, we would like a specific list of those.

The lessee is not exempt from complying with local ordinances. The lease will provide that the lessee shall comply with all applicable laws, ordinances and regulations of the state, county and municipality wherein the lease premises are located. However, Federal lands are exempt from county zoning.

GP44

16-7 Has the Fringe Area Policy Agreement between Johnson County and the City of North Liberty been taken into account in planning this proposal? If not, why not?

Please see response to comment 16-3. The Fringe Policy Agreement is an agreement on planning and zoning. The proposed project on Federal land is exempt from county zoning.

GP44

16-8 Proposed development does not conform to Johnson County Road Performance Standards.

The Johnson County Road Performance Standards are applicable to rezonings and new subdivisions. Because the proposed development does not entail a rezoning or a new subdivision the standards are not applicable. Under the standards the proposed development is considered an existing subdivision, and traffic generated by the proposed facility should be utilized to determine traffic thresholds for rezonings or new subdivisions that may occur in the area.

G5
GP60

17 Community Cohesion

17-1 This is a controversial project that could result in negative impacts to community cohesion which could ultimately affect community and regional growth. This area deserves more attention.

The proposed project does not physically split a neighborhood, isolate a neighborhood, generate any significant new development, or change property values. These items are considered when assessing whether community cohesion is affected, and because no changes in these items are anticipated, it is reasonable to conclude that community cohesion will not be significantly affected.

G5
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- 17-2 The conclusion that the MYCA alternative will not disrupt the neighborhood seems based on someone's opinion. It is my strong opinion that this large development will disrupt this neighborhood. Request data to support this finding.**

The proposal does not include any displacements or the acquisition of property not currently owned by the Corps. The proposal does not physically split any existing developments or neighborhoods. The proposal is also consistent with land use designations originally contained in the 1977 Coralville Lake Master Plan. As stated in the EA, the proposed activity will not physically divide or disrupt the adjacent subdivision. Community cohesion is not impacted.

GP47

- 17-3 The FONSI now demonstrates more clearly that the people who live near the proposed site have not been regarded as a significant and integral part of the environment.**

The EA contains specific analysis of potential impacts to the human environment. A FONSI, if granted, would indicate that the results of these analyses show that the proposed action will not significantly impact the environment. All comments on the EA, including those from area residents, will be considered in the decision making process.

GP81

18 Demographics

- 18-1 The EA states that the proposal has no significant impact on demographics. Johnson County and North Liberty disagree with this view and they are the experts on infrastructure.**

Comment noted. The proposed project should have no impacts on either demographics or infrastructure.

GP93

19 Property Values/Tax Revenues

- 19-1 What are the guarantees that the project will not have an impact on property values?**

The proposed use is similar to previous uses of the site, and is consistent with use designations contained in the 1977 Coralville Lake Master Plan. There appears to be no indication that construction of the proposed camp will impact property values, but there is no guarantee that property values will not change. The use of the Camp Daybreak site by the Girl Scouts predates the development of the residential areas on nearby land.

The proposed development would be adequately buffered from the neighboring residential area to minimize interference from noise, visual impacts, and traffic. In addition, there is no change in the Corps land use plan for the site than what existed previously.

GP65

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- 19-2 The project will cause increases in property taxes.**

By definition the outgrant area is to be used by nonprofit groups. Any development of the site that occurs in accordance with the Master Plan should be eligible to apply for tax exempt status. Public services to the site would continue to be provided in the same manner that they have been provided since the acquisition of the property by the Federal government. Due to the fact that public services are funded through taxes levied upon all taxable properties within the applicable taxing district, and because the project site comprises only a fraction of the land area within any of the affected tax districts, it is unlikely that the project will result in a significant tax increase.

GP9

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- 19-3 The EA states the planned development would have no significant impact on property values in the neighborhood. This seems to be someone's opinion. Strongly disagree and request data to support conclusion.**

The analysis contained in the EA assumes that the area adjacent to the project site was developed with full knowledge that the site was designated as an outgrant area. This assumption is based on the sites previous use as a camp, and upon the sites designation as an outgrant area in the original Coralville Lake Master Plan, dated 1964 and updated in 1977. Development of the outgrant area in accordance with previously adopted and approved plans should not result in any significant impacts to property values.

GP47

20 Public Facilities/Services

- 20-1 The MYCA facility will cause a potential tax burden using public services without paying taxes.**

Please see response to comment 19-2.

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- 20-2 Who will be responsible for: road maintenance/improvement of 200th Street and Scales Bend Road? Fire protection? Emergency Services? Parking? Are these increased services covered in the Environmental Assessment? If not, why not?**

Johnson County is responsible for the roads and emergency services; North Liberty has responsibility for fire protection. The Corps has an existing contract for law enforcement with the Johnson County Sheriff's office. Parking will be the responsibility of the lessee. Section 5.4.10 Traffic and Parking addresses issues related to traffic on adjacent streets and on-site parking. Section 5.4.9 addresses life, health and safety issues.

GP44

- 20-3 Consultation with the City of North Liberty, the Johnson County Board of Supervisors, and the Penn Township Trustees never occurred. Funding for the services that are necessary for public safety are provided by these agencies. Neither MYCA nor COE is providing funding to support these services.**

The Corps has maintained contact with these municipal groups throughout the EA process, beginning with the scoping meeting. These groups have also reviewed the EA and provided input, which will be considered in the decision making process. The Corps and representatives from the city of North Liberty, Johnson County, and Johnson County Board of Supervisors met in March 2003 to discuss concerns, areas of responsibility and process of future events.

The Corps currently has a contract with the Johnson County Sheriff's office to provide law enforcement on Federal lands. In addition, Johnson County receives an annual payment in lieu of taxes based on the number of acres of land owned by the United States in the county. Johnson County also receives an annual payment in the amount of 75% of all rent collected by the Corps of Engineers from leasing land owned by the United States at Coralville Lake located in the county.

GP53

- 20-4 Is the Corps informing the Johnson County Sheriff, the City of North Liberty, and Johnson County Board of Supervisors of the increased needs resulting from this action?**

Johnson County and North Liberty were provided copies of the Environmental Assessment for this proposed action and are aware of the proposal.

GP44

- 20-5 The project has the potential of placing a significant burden on the road, infrastructure and fire fighting capabilities of the City of North Liberty.**

Please see response to comment 20-2 and 21-1.

G2
G4

21 Life, Health & Safety

21-1 Increased safety problems must be addressed with Johnson County and the City of North Liberty.

Comment noted. Alternative 1, the highest use alternative, would add approximately 136 people per day to the area during the summer camping season. The area currently includes approximately 10,000 people. The addition of approximately 1% of the area's current service population would not impact any services. The EA and lease processes will continue to be coordinated with the local area governments.

GP40

21-4 Intensity of preferred alternative creates demands for fire protection, ambulance service, law enforcement, and water rescue services beyond the level that can be provided by the County and North Liberty.

Please see response to comment 20-2 and 21-1. The Johnson County Emergency Ambulance Service has reviewed the EA and finds no significant increase in or impact to ambulance service for the area. All new construction must meet local building codes, which include provisions for fire safety and protection. Law enforcement, including water rescue services, is currently provided by the Johnson County sheriff's office. The Corps currently has a contract with this office to provide law enforcement and rescue services for federal land at Coralville Lake.

G2

G5

21-6 Added demand to fire, police, and emergency personnel creates safety issues.

Please see response to comment 20-2 and 21-1. Johnson County is responsible for issuing a building permit to the lessee. Fire protection, such as sprinklers and an adequate water supply to fight fires, will be addressed through this permitting process.

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21-7 Existing roads are not wide enough and have too much overgrowth to allow fire trucks to enter the facility.

As indicated in Section 3.1.3, Site Improvements, the existing access road will be improved to provide all weather access to the site and allow adequate access for emergency vehicles.

G2

G5

21-8 The convention center will need a sprinkler system and must comply with United Building Codes.

A convention center is not included in the site improvements proposed for any of the alternatives. All structures, including the lodge, will comply with local building and fire codes. The current design capacity of the lodge is 200 people; with no overnight facilities. Final design plans for the site improvements will be submitted to local permitting agencies for review and issuance of building permits.

G2

G5

21-9 Based on a structure 107 x 70 x 30 water needs are 2,247 gallons a minute for four hours. This will require all the water trucks from the entire county.

Comment noted. The EA addresses the potential need for a non-potable water supply for fire fighting needs. When the building designs have been finalized, an accurate estimate for water demand for fire fighting needs can be established. See response to comment 21-8.

G2

G5

21-10 Weather conditions could provide additional delays to fire fighting activities at the camp due to the steep elevation of the access road into the camp.

Scales Bend Road is an existing county road, and no improvements to the road are proposed in the MYCA lease application. Please see response to comment 21-7.

G2
G5

21-11 A dry hydrant will not work at the facility.

Detailed design of site improvements has not been completed. Final designs will be submitted to applicable agencies/departments for review and issuance of permits prior to construction. Any new construction will be required to meet building codes.

G2
G5

21-12 Tent and cabin areas are difficult to access with hose lines. Widening trails might make this easier.

Comment noted. See response to 21-8.

G2
G5

21-13 Who will have jurisdiction over building codes and other safety issues?

State and local permitting authorities have jurisdiction over building codes and safety issues.

G2
G5

21-14 The fire department should be compensated for coverage of a commercial building.

None of the alternatives evaluated propose the construction commercial buildings.

G2
G5

21-15 Storm shelters need to be addressed for the safety of the people.

Comment noted. This issue should be addressed during lease negotiations.

G2
G5

21-16 Who is responsible for evacuating people from the site that do not have cars?

The camp director and the camp counselors would be responsible for the care of the campers and preparation of emergency plans.

G2
G5

21-17 How will the presence of buses affect the ability to get firefighting equipment into the site and set up?

Buses would be parked in a location that does not interfere with overall on-site traffic circulation.

G2
G5

21-18 There has been a very serious incident related to opposition to this over use of the Daybreak Site. Authorities investigated and photographed disgraceful acts of a possible life threatening nature.

The Johnson County Sheriff was not able to provide any information or insight regarding this incident with the level of information provided.

GP96

21-19 Not enough information in EA to enable the Johnson County sheriff to estimate the effects of the proposed use on the sheriff departments contract with the Corps.

More detailed information would be provided to the Johnson County Sheriff's office during lease negotiations.

G5

21-20 Proposal will not negatively impact the ability of Johnson County Ambulance Service to provide service to the area.

Comment noted.

G5

21-21 Weather sirens, maybe weather radios, and shelters are needed during inclement weather conditions.

Comment noted. These issues should be addressed during the lease negotiations.

G5

21-22 MYCA Food service facilities must meet the requirements of the Iowa Food Code.

Comment noted. Approved uses will comply with applicable codes.

G5

21-23 If abandoned wells are located on the site, they must be properly plugged in conformance with Johnson County Board of Health Regulation Governing Non-Public Water Supply Wells 49.15.

Comment noted. Approved uses will comply with applicable codes.

G5

21-24 If a pool or spa facilities are planned in the future, Johnson County Public Health should be contacted as the delegated regulatory authority by the Iowa Department of Public Health for the swimming pool and spa rules.

Comment noted. Approved uses will comply with applicable codes, however no pools or spas are proposed under any of the alternatives.

G5

21-25 Winter use, fire can be a problem. Will building be sprinklered, have smoke detectors, have extinguishers? Are trained personnel on site to insure proper operation of these life safety devices?

New construction will meet fire and building codes. Camp personnel will be trained appropriately.

G5

21-26 Will MYCA contract for fire protection?

The lease proposal submitted by MYCA does not include any reference to contracting for fire protection. Fire protection for federal lands in the area is currently provided by the North Liberty fire department.

G5

21-27 Will hazardous materials be onsite, and if so will there be personnel to handle these products?

On-site storage of hazardous materials is not included in any of the alternatives considered.

G5

22 Traffic and Parking

22-1 It was noted in the EA report that it used an IDOT VPD count from the fall of 1998. It indicated that road loads were near capacity. Why wasn't a summer VPD done which would also include vehicle loads from Jolly Roger Campground?

Year end and monthly visitation reports for Jolly Roger Campground were used in conjunction with available IDOT traffic counts. IDOT is a recognized source of reliable traffic data.

GP27

22-2 Increased traffic is a concern.

Section 5.4.10 Traffic and Parking provides an analysis of traffic and roadway capacity. The analysis indicates that Alternative 1 would add less than seven (6.21) vehicles during the a.m. peak hour period, and would have no appreciable impact on the local road system. Seven vehicles an hour during the peak hour is a negligible increase and will not result in a significant impact to current traffic.

G2

G5

GP2

GP10

GP17

GP41

GP57

GP62

GP68

GP74
GP90

22-3 The county road needs work to handle the traffic

Please see response to comment 22-2.

G5
GP2
GP11
GP41

22-4 The intersection of 200th Street and Scales Bend Road is dangerous for anyone turning south because of a blind curve.

As indicated in the EA, no accidents have been recorded in recent years at the 200th Street NE and Scales Bend Road intersection. It is unlikely that the limited amount of additional traffic associated with any of the Alternatives could significantly impact the overall accident rate at this intersection.

GP2
GP3
GP62
GP65

22-5 Increased traffic problems must be addressed with Johnson County and the City of North Liberty.

Please see response to comment 22-2.

G2
G5
C1
GP18
GP28
GP33
GP38
GP40
GP60
GP79
GP94

22-6 Traffic numbers from Zambrana Engineering, Inc. and the MYCA proposal are unrealistic given the size of the facility. The impact on the area has been based on unrealistic predictions of traffic and unspecified plans for off-site parking areas.

Traffic analysis contained in the EA is based on existing traffic counts obtained from IDOT, traffic generation rates prepared by the Institute of Traffic Engineers, and capacity levels published by the Transportation Research Board. These sources, in combination with traffic projections contained in the MYCA lease application, which are based on their operational scenario, were used to develop the analysis in the EA.

Traffic generation is stated as ADT which means average daily traffic. This recognizes that on some days traffic will be higher than average. This will occur during days when campers are picked-up or dropped off. As indicated in MYCA's proposal, pick-up and drop-off activities would occur during nonpeak hours. As indicated in the EA, this increase in traffic would not impact roadway capacity.

Please see response to comments 22-16 and 22-21.

GP20
GP36
GP53
GP62
GP68

22-7 There are alternatives and compromises that could be reached to address any valid concerns that might exist for roadways and emergency services.

Comment noted.

G5

GP75

- 22-8 The County raises valid concerns over traffic and emergency responses. It seems likely that the Corps could proceed with this plan. Additional traffic generated by this development and by future development in the area makes it logical for the County to consider upgrading roads.**

Comment noted.

G5

GP75

- 22-9 Due to the concern over the adequacy of parking spaces, on-site and off-site parking and a shuttle system would be required.**

As indicated in Section 5.4.10 of the EA, adequate on-site parking is provided for the camp operations associated with Alternative 1. If additional offsite parking for noncamp activities is required, the lease applicant will be required to provide such parking. If the lease applicant is unable to provide offsite parking, the usage of on-site facilities would have to be limited to a level supported by on-site parking facilities.

G5

GP75

- 22-10 The traffic will disrupt our lives.**

The traffic analysis contained in the EA does not indicate any significant increase in traffic for any of the alternatives.

GP3

GP38

- 22-11 The MYCA plan does not provide for adequate parking especially for a facility that can accommodate 200 people for special events.**

Please see response to comment 22-9.

NGO1

C1

GP18

GP28

GP36

GP38

GP67

GP87

GP94

GP96

- 22-12 What is the proposed impact for traffic on Scales Road?**

Please see response to comment 22-2.

GP70

- 22-13 Traffic data from 1998 or 2000 is outdated and the report needs to consider the increased traffic from an increase in development in the area.**

The traffic analysis included Level of Service (LOS) based on assumed new development, including an additional 115 residences. Data from 1998 and 2000 is not considered outdated for a traffic analysis of this type. Additionally, the analysis included traffic that would be generated from residences on 115 platted lots on existing, yet undeveloped lots.

G2

GP41

GP96

- 22-14 Added cars and buses from the development will cause significant traffic and road dangers.**

Please see response to comment 22-2. The traffic analysis conducted as part of the EA considered buses used in the operation of the proposed camp.

GP65

22-15 Considering the number of vehicles associated with MYCA, will MYCA be assessed for road usage/improvements? If not, why not?

Assessments for road usage/improvements are incorporated into the Johnson County Road Performance Standards, therefore, please see response to comments 16-8 and 22-2.

GP44

22-16 The counts used for traffic and parking are seriously flawed.

Please see response to comment 22-6. Traffic rates were determined from the MYCA proposal as submitted and ITE standard traffic generation rates. The operational scenarios presented by the commenter do not reflect the operational plan for the Camp presented by MYCA, and were therefore not part of the evaluation contained in the EA.

G5

GP19

GP47

22-17 Neighbors concerns regarding high traffic on 200th Street, where there are no sidewalks for children walking to and from the school bus each day, were omitted from the EA.

Existing average daily traffic on 200th Street at its' intersection with Scales Bend Road is 136 vehicles per day. The additional traffic associated with Alternative 1 would add an average of 6.21 vehicles to the local roadways during the a.m. peak hour. The entrance proposed for Alternative 1 is located near the western end of 200th Street. The addition of 6.21 vehicles during the a.m. peak hour to 200th Street, west of most of the existing residences, is not expected to significantly impact the safety of students residing in homes along the north side of 200th Street.

GP47

22-18 The preferred alternative would entail considerable cost for road construction and improvements not currently included in the County's five year plan.

Please see response to comment 22-2 regarding projected increases in traffic.

G5

22-19 Accident data presented in the EA is insufficient to justify the statement that "it is extremely unlikely that the small amount of additional traffic associated with the alternatives could materially impact the overall rate."

The EA states that no evaluation of the accident rate has been conducted, due to the fact that no accidents have been recorded in recent years at the 200th Street NE/Scales Bend intersection. The determination that it is unlikely that the small amount of additional traffic associated with the alternatives could significantly impact the overall accident rate on Scales Bend Road or the intersection was made based on observations of traffic characteristics along Scales Bend Road, speeds on the road as observed by Johnson County, the absence of any reported accidents in recent years, and the trip generation for each of the alternatives.

G5

GP33

22-20 There are no plans in place at this time for improvements to Scales Bend Road NE or for 200th St NE, or the intersection of Scales Bend Road NE and 200th St NE.

Comment noted. Please see response to comment 22-2 regarding projected increases in traffic.

G5

22-21 While the MYCA proposal is stated to generate 50 vehicle trips per day, it is not unreasonable to estimate an average daily trip generation of 200-300 trips per day. Using higher trip generation numbers of 200-300 trips per day does not impact the capacity of 200th St. NE or Scales Bend Road.

A daily trip generation of 200-300 trips is not consistent with the proposed activities at the camp. An independent traffic analysis concluded that the total amount of traffic from any of the alternatives evaluated in the Environmental Assessment would not create a significant change or impact to the existing roadway systems.

G5

- 22-22 The project will require significantly more parking than is currently provided on site. No one from MYCA has approached North Liberty with plans for an off-site parking lot, which may not be permitted under the zoning regulations.**

Please see response to comment 22-9.

G2

- 22-23 Johnson County taxpayers would pay for a new road because of a federal government decision. Will the federal government help pay for improvements to Scales Bend Road?**

An independent traffic analysis concluded that the total amount of traffic from any of the alternatives evaluated in the Environmental Assessment would not create a significant change or impact to the existing roadway systems. The Corps of Engineers has no authority to pay for improvements to Scales Bend Road.

GP13

- 22-24 The issue with the adequacy of Scales Bend Road exists, incidental of the MYCA proposal. Any redevelopment of the property that increases traffic will exacerbate the road surface adequacy issue.**

Comment noted. No significant change or impact to the existing roadway systems is anticipated from any of the alternatives evaluated in the EA.

G5

23 Aesthetics

- 23-1 The EA downplays the impact of the change in the visual impact that the retreat/conference center will have on the landscape. There is currently no development visible at this location from the reservoir.**

In section 5.4, the EA addresses the visual change from the reservoir as a result of development on the shore. As other areas along the lake have been developed with residential and recreation related facilities, views from various parts of the lake include structures. Analysis in the EA concluded that the buildings proposed under Alternative 1 would not constitute a significant visual impact. Development would include minimal loss of trees to preserve the rustic setting and use of architectural and landscaping design to reduce aesthetic impacts consistent with other development around the lake.

GP47

GP61

- 23-2 The layout of the facility cannot be accomplished in such a manner that privacy is assured to surrounding neighbors.**

As stated in Section 5.4.11 of the EA, site design of structures proposed in Alternative 1 would be developed approximately 400 feet from the north property line and adjacent neighborhood and at an elevation approximately 20 to 70 feet below the ridgeline. This location will reduce visibility of the facility from the adjacent residences. Forested areas would remain between the facilities and the adjacent neighborhood.

GP68

- 23-3 The proposed location keeps the development at a low enough elevation to avoid negative impacts to the viewshed of the residential sites to the north. During the growing season, leafed out trees would alleviate concerns about the viewshed.**

Comment noted. Please see response to comment 23-2.

G5

GP75

- 23-4 I appreciate the attempt to mitigate aesthetic impacts to the viewshed, but I think people will find what they see from the lake and perhaps from residential areas to be significant.**

Comment noted. Please see response to comment 23-1.

G5

GP75

- 23-5 I think there would be significant visual changes with this development, but I don't think they would have to be negative. In fact, people boating on the Lake might find the alternative they see to be educational and aesthetically pleasing.**

Comment noted.

G5

GP75

- 23-6 Light from the proposed facility will be visible to adjacent landowners.**

The proposed facility in alternative 1 would be constructed below the ridge line located on the north side of the property. See response to comment 23-2. This location minimizes light from the facility. Existing vegetation within a 400-foot buffer between residences and the proposed facilities also minimizes light from the facilities to adjacent properties.

C1

GP28

GP74

- 23-7 The EA does not evaluate the effect of light pollution.**

The potential for light pollution was not a separate environmental category required for analysis in the EA. However, the potential for light to cause impacts to adjoining properties is considered in the analysis aesthetics in Section 5.4.11 when discussing visual impacts. This analysis concludes that none of the alternatives would constitute a significant aesthetic impact, particularly alternative 1. Lights from the proposed facilities would be limited to the developed areas located close to the shoreline, approximately 400 feet, through a forested area, from the adjoining residential area.

GP19

24 Economy

- 24-1 Will the lessee be required to do an economic analysis of the proposal to include costs to the Corps and Johnson County?**

The Corps will not require the lessee to do an economic analysis of the proposal to include costs to the Corps and Johnson County. Any information provided by Johnson County regarding the potential costs and benefits the County would incur will be considered.

GP44

25 Noise

- 25-1 Noise is a major concern. The noise will disrupt our lives.**

Comment noted. Please see response to comment 25-2.

GP2

GP3

GP57

GP61

GP74

- 25-2 Campers and camp activities will cause increases in noise beyond 67 decibels. Vegetation will have little impact on reducing noise.**

As discussed in Section 5.3 of the EA, a noise model analyses performed for each of the alternatives indicated that predicted noise levels do not exceed 67dBA (the accepted noise level for residential activities at which any increase above would be considered for abatement) or demonstrate a significant (14 dBA) increase over existing levels. Minor noise increases will occur from project alternatives 1 and 2 as a result of activities on the site, however, these increases are not considered significant and would not require abatement measures.

GP27

GP65

- 25-3 Why weren't existing facilities in the area considered for noise evaluation?**

Noise levels generated by camping activities were assumed to be 55 dBA, a typical noise level at intermediately populated lake beaches (Komanoff and Shaw). It was assumed that this level was an appropriate noise level for the proposed camp area as no similar developments exist in the area.

GP27

25-4 Will the facility use loudspeakers to communicate with campers?

Specific operational issues associated with the proposed camp would be discussed during preliminary and final design and approved by the Corps through a lease. At this time, the MYCA proposal does not mention the use of loud speakers.

GP98

25-5 The noise analysis is not complete without consideration of camp activity and boat traffic noise.

See comment 25-4. Boat and jet ski noise was also considered in the noise analysis as shown in Table 4-18 of the EA. No additional boat noise will be generated by any of the alternatives.

GP96

25-6 The Traffic Noise Model analysis was done incorrectly. The noise inputs used were in the cabin and beach areas and were further from the receptors than indicated by the scale.

Noise inputs were located in areas where it was determined noise levels from camp activities would be the greatest. The scale units on Figure 4-2 will be corrected in the Final EA. The exhibit is a graphic representation of receptor locations, and a corrected scale will not alter their locations. The analysis of no significant noise increase at the receptors is correct.

GP19

25-7 The effect of noise from 150-200 campers 300 feet from private homes was not addressed.

The maximum number of campers for this site would be 120, plus 16 staff. The level of 55 dBA was used as an input to the noise model representing the typical noise level at a camp. As stated in the EA, the model considers factors such as distance from the proposed activity to receptors, terrain, and features such as tree cover. With the 55 dBA input and these factors, the noise model indicated that, with implementation of the MYCA proposal, noise levels at the 5 receptors would be between 23.5 dBA and 38.1 dBA.

C1

GP44

GP47

GP61

25-8 The EA incorrectly evaluates the impact of noise. No ambient noise levels were measured. Representative values are not sufficient.

The model was utilized to estimate the increase in noise that is attributable to each alternative. For that purpose, representative ambient noise levels are appropriate as an input for a model.

GP19

25-9 Noise issues such as amplified sounds, calls to prayer, and bells were not addressed.

Please see responses to comments 25-3 and 25-4.

C1

GP19

25-10 There will be increased noise with the project, however it may not be significant.

Comment noted.

G5

GP75

26 Cultural Resources

26-1 I trust this finding (no impact). It sounds like the site has been well studied and documented.

Comment noted.

G5

GP75

26-2 The beach area will be in an area where artifacts have been found. How can the loss of these artifacts be insignificant?

All of the archeological sites documented within the potential lease area have been evaluated against the National Register of Historic Places (NRHP) Criteria of Significance (36 CFR Part 63) and found to be ineligible for inclusion on the NRHP. As a result, the Corps has determined that the undertaking would have No Effect on significant historic properties. This finding and determination have been provided to the relevant federally recognized tribes, local historical societies, and the State Historical Society of Iowa and is in full compliance with the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR Part 800.

GP33

26-3 More detailed information on the archeological sites identified on the site is needed in order to evaluate the finding of no significant impact. Who made the determination that the sites were not eligible? What were the cultural resources within the Area of Potential Effect (APE). State Historic Preservation Office (SHPO) concurrence was only by lack of response.

Disagree. There is sufficient information provided in Section 4.7 of the EA that includes summary information about past surveys, recorded archeological sites, investigation techniques, cultural affiliation of the archeological sites, and the types of sites documented in the area of potential effect. The Corps, as the lead federal agency, made the determination that the sites were not eligible for inclusion on the National Register of Historic Places (NRHP) and sought comment from the State Historical Society of Iowa (SHSI), relevant federally recognized tribes, and other interested members of the public by letter dated October 12, 2000. No comments on the Corps determination were received. Pursuant to 36CFR800.3(c)4, a federal agency may proceed with an undertaking if comment is not received within thirty (30) days of the date of the consultation letter. The SHSI formally identified that date as November 16, 2000 and acknowledged their lack of response with a stamped concurrence dated November 20, 2000. Further, the SHSI concurred with the Corps findings as presented in the Environmental Assessment by letter dated December 6, 2002.

G9

26-4 The State Historical Society of Iowa stated that the information on cultural resources provided in the EA is accurate and that they concur with the finding of No Significant Impact.

Comment noted.

G1

26-5 There are considerable numbers of stories/artifacts about Native American homes, burial sites, and campsites in this area, known to locals as "Indian Cove". What actions has the Corps taken to research this information? Has the Corps acted upon information already forwarded in this regard?

The Corps consulted with four different cultural resource investigations conducted over the past twenty years (see Table 4-20, pg 39 of the EA) and determined that there are no significant historic properties within the area of potential effect. The Corps provided this determination to the State Historical Society of Iowa (SHSI), federally recognized tribes, and interested public by letter dated October 12, 2000. As part of that correspondence, the Corps sought information from the interested parties about concerns with issues relating to the undertaking's potential effects on historic properties and tribal concerns about properties of religious and cultural significance. No comments were received with the exception of a stamped concurrence from the SHSI. The Corps has used the best available data in consultation with the interested public and in full compliance with the NHPA and 36 CFR Part 800.

GP44

27 Solid/Special Waste

27-1 I trust the finding of no significant impact for solid/special waste.

Comment noted.

G5

GP75

27-2 There are waste disposal concerns.

Waste generated from any of the project alternatives would not be significant due to the recreational type of activities being proposed. Proper waste disposal by a contract refuse hauler would be a lease requirement.

GP3

28 Manmade Resources

- 28-1 I concur with the finding of no significant impact to manmade resources.**

Comment noted.

G5
GP75

29 Public Involvement/Notice

- 29-1 The timing of the release of the Environmental Assessment over the holiday season was problematic. Forty-five days for public review was not given because copies of the EA were received several days into the comment period.**

The standard length for the public review and comment period for any Environmental Assessment is 30 days. The comment period for this EA was increased to 45 days, in part due to the holidays.

C1
C1
C2
GP19
GP96
GP97
GP98

- 29-2 Zambrana Engineering did not adequately assess the extent of public opposition in the environmental assessment.**

The purpose of the EA is to assess potential environmental impacts as a result of the proposed project, including impacts to the social environment. The EA process includes public involvement which is designed to gather citizen input. The EA includes a Content Analysis Report which documents this input and public comments made regarding the proposed project. All letters received during the public comment period for this EA will be considered in the final decision.

P1

- 29-3 Is it true that no one from the Corps or from the contractor failed to talk to an effected council member or mayor in North Liberty or Johnson County during or even before the EA study?**

The Environmental Assessment examined impacts from several proposed levels of use and development of the former Camp Daybreak site. A public scoping meeting was held in July 2000. Local governmental organizations, neighbors, and interested parties were invited. In addition, Zambrana Engineering, Inc., the contractor for this effort, contacted Johnson County officials for information used in preparing the Environmental Assessment. Johnson County, North Liberty, and Penn Township trustees all reviewed the Environmental Assessment and provided comments. All substantive comments must be addressed prior to any decision on this project.

GP94

- 29-5 I object to the previous Content Analysis Summary as comments were reinterpreted and summarized to minimize concerns.**

Comments received at the public scoping meeting and immediately following were categorized by topic in the Content Analysis Report (CAR), a summary of which is included in the EA. Categories were coded for analytical purposes. Comments were noted for each comment category indicating whether it was an issue for inclusion in the EA, if it needed to be addressed at the lease agreement stage, or if it was not an issue that either the EA or lease could address. Fifty-one percent of the comments received were addressed in the EA as shown in the index provided in the CAR Summary. The remaining comments are lease issues or not applicable to the EA/FONSI decision.

NGO1

29-6 What methods of public notification will be used in relation to the EA? (We do not believe that 48 hours notice of the scoping meeting was acceptable.)

A public scoping meeting was held on July 12, 2000. An afternoon session from 2:00 to 4:00 p.m. and an evening session from 7:00 to 9:00 p.m. were conducted. Legal ads providing public notice for the meetings were published in the Cedar Rapids Gazette on July 3, 8, 10, 11, and 12, 2000 and the Iowa City Press-Citizen on July 6, 7, 8, 10, 11, and 12, 2000. Individual notices were sent to over 350 people on July 7, 2000. Notices were also sent to radio stations KXIC and KCJJ on July 10, 2000 to be included in their daily public service announcements.

A copy of the Environmental Assessment was mailed to the appropriate federal, state, and local governing agencies, to all neighbors and to every person who requested a copy. In addition, the EA was posted on the previously established Corps web site. Finally, the Corps' Public Affairs Office issued a news release to all local media to coincide with the public review period.

When the final decision on the EA is made, all parties on the original distribution list and any additional people who submitted public comments on the EA will be notified by mail of the availability of the decision documentation, comment letters and responses, and locations for viewing this package. This package will be posted on the Corps web site. Hard copies will be available at area post offices, libraries, and at the Coralville Lake project office.

GP44

29-7 We were lead to believe that all concerns would be addressed. Many specific issues of concern that were submitted during the scoping meeting were not addressed.

Please see response to comment 29-5. All comments received during the public review and comment period will be addressed in this document.

GP44

GP67

GP71

30 Environmental Impacts

30-1 The proposed project will cause degradation of natural resources and the environment, increased traffic on the area roads, require extra police and fire protection, and invade the rural lifestyle of the area. It should not be approved at this location.

The EA was conducted to assess the project alternatives in terms of potential impacts to the environment. Twenty-four environmental impact categories were examined, by project alternative, including natural resources, health and safety, and the social environment. The EA concluded that, in each category, no significant impact would occur to the environment for any of the alternatives. In addition, the proposed use is consistent with the Master Plan land use designations for the site and consistent with the past use of the site.

GP9

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GP42

GP64

GP74

GP76

GP81

GP97

30-2 Project impacts to the environment are too great.

Please see response to comment 30-1.

NGO1

GP26

GP32

GP42

GP55

GP72

GP91
GP92
GP98

30-3 The consequences of improper environmental management are permanent for all.

Please see response to comment 30-1. In the event the lease is terminated, the lessee is responsible for returning the proposed site to a satisfactory condition, as determined by the District Engineer.

GP17
GP40

30-4 It appears that the environmental impacts of such an intensive use can be mitigated, and there may be some benefits accrued from using the property again.

Comment noted. Please see response to comment 30-1.

G5

30-5 There are valid environmental concerns with this development such as: construction site erosion, post-construction run-off, waste-water treatment, aquatic ecology, stormwater management, groundwater recharge, parking, altering soil profiles, and soil compaction. These concerns can be overcome with restoration and ecological management and green development using such techniques as: understory removal, elimination of invasive plants, fire management, reconstructed ecosystems, green building designs, green stormwater management, restoring stable hydrology, wetland wastewater treatment facilities, cistern run-off control and infiltrating traffic system.

Please see response to comment 32-3.

G5
GP75

30-6 The noise, traffic, waste water, wells, zoning and emergency service issues are no different from those that arose when the location was a girl scout camp.

Comment noted. As the site has been designated an area for recreation/intensive uses, most issues related to operation of a recreation facility at this location will be the same under different use proposals. Specific issues relating to wastewater, forest management, and other service-related activities would be addressed during lease negotiations.

GP1

30-7 Little mention is made in the EA of the impact of construction operations on the site and adjacent roads and properties.

It is noted in the EA that construction activities will be temporary activities. Elevated noise from construction activities may occur at the site, but would be of short duration and spread over a period of two years according to the MYCA proposal. Issues relating to erosion and stormwater management during construction would be addressed through an NPDES permit (see response to comment 8-2). Impacts to roads and adjacent properties from construction activities are not expected and were not addressed in the EA. Please see response to comment 31-18.

GP62

30-9 The location of the project has too great of impact upon the surrounding land as it will impact 5 acres of woods on a narrow strip of lake property that encompasses about a mile of shoreline on Coralville Lake.

Please see response to comment 9-3.

C1
GP87

30-10 Significant impacts will result to the local residential community by increasing traffic flow, noise, safety concerns, and raising water quality issues. These issues were raised by the Johnson County Board of Supervisors and Cumberland Ridge Homeowners and were ignored or superficially treated by the EA.

While the impacts that would result from the proposed project are measurable, they are not considered to be significant. All impacts fall within reasonably accepted levels and are representative of levels that would be expected to occur as a result of a camp development in this type of semi-rural setting. Traffic, noise, health and safety, and water quality issues were addressed in the EA in Section 5.0, Environmental Consequences. Please see response to comment 30-1.

GP17

GP36
GP67
GP96

- 30-11 The EA states that "most of the construction and day-to-day activities at the site would be in areas that have been previously disturbed." Disturbance to the extent required for alternative #1 has never occurred at this site.**

To minimize removal of trees and any impacts to the site, development would occur in the area previously used as Camp Daybreak. Additional areas beyond the former Camp Daybreak footprint would be required for the level of development proposed in alternative 1. Measures would be implemented to minimize any environmental impacts such as replacing trees with native vegetation.

GP47

31 EA Document

- 31-1 The EA is vague and inaccurate and doesn't address environmental impacts. A FONSI cannot be determined because the EA has significant errors and omissions.**

Comment noted. Comments that identify specific areas of concern have been individually categorized and a response has been provided for each of these comments. Also see response to comment 31-8.

GP6
GP17
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GP19
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GP61
GP66

- 31-2 There are many inconsistencies in the EA including statements on number of employees, religious affiliation of youth to be served, and consideration of the lodge in calculation water demand.**

Alternative 1 is a level of use represented by the MYCA lease application. The number of employees is based on information contained in MYCA's lease application. The religious affiliation of the youth served by the camp does not affect the analysis of environmental impacts. Water usage for the lodge is based on the activities proposed in MYCA's lease application.

GP93

- 31-3 The science and math of the EA are flawed.**

Please see response to comment 31-1.

GP3

- 31-4 The EA underestimates the environmental and financial impacts to Johnson County.**

Please see response to comment 30-1. No significant environmental, social or infrastructure impacts were identified in the EA.

GP13

- 31-5 The errors and omissions of the EA warrant an EIS. Specific issues include inconsistency with local planning, substantial increases in traffic, need for a wastewater variance, the scale of proposed buildings are not consistent with existing building, and there is community controversy.**

The EA includes an evaluation of these issues, and concludes that Alternative 1 does not significantly impact them; therefore, a Finding of No Significant Impact is appropriate and an EIS is not required. Please see response to comment 30-1.

GP12
GP51
GP62
GP67

- 31-7 The EA is incomplete in that it does not consider fences, borders, barriers to be constructed, drainage impact, impact of dredging, no well draw down study, beach impacts, and no wetland drainage impact statement.**

Alternative 1 consists of a level of use represented by the application submitted by MYCA. As such the evaluation is generally based on the site plan included in the lease application. Section 5, Environmental Consequences, considers impact of the alternatives. No fences, borders, barriers, wetland drainage or dredging are proposed.

GP5
GP7
GP18
GP62

- 31-8 The errors and omissions in the EA slant the findings in favor of a finding of "no significant impact" and toward a decision in favor of Alternative 1. These inaccuracies include the misplacement of wells, the distance from the osprey nest to the main lodge, the land use designation of Corps plans, surrounding land uses, location of residences and property lines, and the basis of counts that are not maximum numbers.**

The exhibits contained within the EA provide a graphic representation of site characteristics. The exhibits were not used for the technical analysis contained in the EA, but rather reflect the general location of items subject to this analysis. The graphic illustration of the community well located in the subdivision north of the site represents the well's approximate location. The IDNR setbacks for the sanitary treatment facility are measured from the nearest inhabitable residence, which is closer to the site than the referenced well. The location of the well does not affect the analysis. The land use designation by the Corps is correctly illustrated in the EA. The general location of residences is based on aerial photography that were obtained from Johnson County and field visits. Please see response to comment 9-7 regarding osprey, and response to comment 6-1 regarding land use designations.

GP7
GP19
GP50
GP53
GP62
GP68

- 31-9 Will the omissions and inaccuracies in the EA be addressed before a lease is signed? (See comment 31-8). If not, who will ensure the omissions and inaccuracies are addressed before construction starts?**

All substantive comments must be resolved and approved by the Corps before the Corps can sign a FONSI. Lease negotiation can be completed only after the environmental process has been completed.

GP7

- 31-10 The EA fails to provide a hard analysis as required by NEPA.**

All of the issues identified through the initial coordination process and the public scoping meeting have been analyzed and addressed. The EA has been submitted to review agencies listed on the distribution list (Appendix C of the EA). Please see response to comment 30-1.

GP62

- 31-11 Much of the data used in the EA was outdated.**

The EA utilized the most currently available data when prepared and thoroughly examined the current condition of the project site and surrounding areas.

GP65
GP96

- 31-12 The EA seems tainted and fails to be upfront about the obvious impact of the proposal.**

Please see response to comment 30-1. The EA was prepared by a neutral party, Zambrana Engineering, Inc.

GP65

- 31-13 The EPA stated that a review of the EA had found nothing of consequence or significance and therefore the EPA would not be making a formal comment.**

Comment noted.

G6

- 31-14 The numbers of users in the EA are approximately 25-38% too low. This error directly influences the overall conclusion of the EA.**

The EA identifies methodology and data sources. The number of users was taken from the MYCA proposal that was submitted with their lease application.

GP46

- 31-15 The facility requires a section 402 permit if construction exceeds 4.8 acres. I cannot believe that this facility only impacts 4.8 acres.**

Comment noted. This acreage value is based on the preliminary design for the proposed project and at an appropriate level of detail for the environmental analysis of impacts. The final number may vary but not significantly nor will this potential variation affect the analyses in the EA. If the final construction area meets or exceeds 5 acres, a section 402 (NPDES) permit will be required and must be obtained by the lessee.

GP48

- 31-16 USFWS - No objection**

Comment noted.

G3

- 31-17 The EA contains errors in locations of existing residences, wells, roads, traffic counts, site elevations and other environmental features.**

Please see response to comment 31-5, 31-8, and 31-22.

GP19

GP32

GP60

GP96

- 31-18 The EA lacks mitigation measures and potential impacts for construction that are usually in an EA. Specific examples are: staging area for construction office, methods for returning staging area to pre-construction conditions, methods for controlling dust, methods for controlling noise, instructions for construction vehicles to reduce idling and air quality impacts, fencing to define area, protection methods to avoid conducting activities outside of the construction area, revegetation plan, plans for prevention of spread of exotic vegetation, tree pruning guidelines, plan for daily construction clean-up, plan for preventing water contamination by vehicle fuel leakage, plan for handling unknown archeological resources, plan for minimizing soil erosion, plan for excavated material, plan for restoring soils compacted during construction, variations on construction timing to minimize noise impacts, traffic plans to minimize disruption to neighbors, emergency plan for construction accidents.**

These are issues that are typically not included in an EA, but would be required as part of the permitting process after final design is approved and prior to construction. In addition, a Development and Management Plan will be required as part of the lease. Best management practices will be required during construction. Please see responses to comments 8-2, 8-8, and 30-7.

GP51

- 31-19 The EA lacks an evaluation of impacts occurring outside the parameters of the project that are usually in an EA. Specific examples include: dust from increased traffic from construction and post-construction (no mitigation plan), wear and tear on county roads both for construction and post-construction (no mitigation plan), noise from both construction and post-construction (no mitigation plan), light effects from construction and post-construction (no mitigation plan), plans for potential safety hazards (school children walking to bus stop), plans for potential safety hazards (risk associated with increased traffic), costs to county taxpayers due to increased services (road improvements, fire-fighting), and visual changes to the natural aesthetics.**

Please see response to comment 31-18.

GP51

GP62

- 31-20 A "NEPA Call-In " website for GSA seems to indicate that the proposed action requires the preparation of an EIS.**

Engineering Regulation (ER) 200-2-2, Procedures for Implementing NEPA, provides Corps' specific guidance for conducting environmental assessments. Under these regulations, the type of proposed action being investigated is an action which requires an Environmental Assessment. If significant impacts are identified during the EA process and a Finding of No Significant Impact (FONSI) is not made, the Corps could proceed with an Environmental Impact Statement (EIS).

GP51

- 31-21 'Previous Use' section of EA is inaccurate, specifically regarding year round use, water system and leach field.**

The 'Previous Use' section is correct. Please see response to comment 6-9.

GP96

- 31-22 The EA exaggerates the north-south span of the proposed lease property.**

The exhibits contained within the EA provide a graphic representation of site characteristics. The exhibits were not used for the technical analysis contained in the EA, but rather reflect the general location of items subject to this analysis.

GP19

32 EA Process & Scope

- 32-2 Why couldn't a process similar to one used by North Liberty City planners when making decisions affecting the community have been used regarding this project?**

During development or update of the Master Plan, coordination with interested parties and agencies is required. Page 63 of the 1977 Master Plan contains a list of these agencies. During this coordination, few, if any, suggestions were made about the types of recreation facilities that might be developed or where they might be located. No changes to the Master Plan are being proposed for this project.

GP64

- 32-3 More work is needed on the EA to include restoration ecology and green development aspects. Impacts on all four alternatives need to be evaluated with these principles in mind.**

The EA evaluates the significance of impacts associated with each of the alternatives. Green development techniques may enhance site characteristics, however, these techniques are typically utilized in the restoration of sites and are not a requirement for the development. The Corps supports green development, and MYCA has proposed the use of green development techniques. Details of green development may be incorporated into the final lease.

G5

GP75

- 32-4 The "process" followed by the Corps does not take into account the communications of the public.**

A public scoping meeting was held at the beginning of the environmental assessment process to identify the local concerns. The Environmental Assessment was distributed to over 475 parties for review and comment. All substantive comments must be addressed prior to any decision on this project. Please see response to comment 7-2.

C2

GP3

GP16

GP65

GP67

GP81

GP96

- 32-5 The Corps is prejudiced in favor of the MYCA proposal.**

Disagree, the Corps serves all segments of the general public. Lessee evaluations and preparation of the EA were separate processes. The EA was prepared by a neutral third party, Zambrana Engineering, Inc.

C1

GP50

GP67

32-6 What are the specific processes to be completed for the Environmental Assessment? By whom, and when? How will the community be involved in each step?

Engineering Regulation (ER) 200-2-2, Procedures for Implementing NEPA, provides Corps' specific guidance for conducting environmental assessments. Guidance for involving the public is provided. See response to comment 29-6.

GP44

32-7 What other environmental agencies will be involved in the EA?

Initial correspondence regarding preparation of the EA was distributed to agencies and individuals listed in Appendix A of the EA. The Final EA with draft FONSI was submitted to those agencies listed in Appendix C of the EA for review and comment.

GP44

32-8 Is a finalized, detailed set of plans from the proposed lessee (i.e. blue prints, land usage, locations of buildings/roadways/septic systems/water access/etc.) required prior to undertaking the Environmental Assessment? If not, why not?

Detailed building plans that would be used for building permit application are not required prior to the undertaking of an EA. Information adequate to conduct the analysis is required. The lease application submitted by MYCA and development plans representing Alternatives 2 and 3 are adequate to determine the potential for environmental impact.

GP44

33 Other

33-1 Will the Girl Scouts be required to bear the cost of site clean-up?

The Girl Scout Council remains responsible for removal and cleanup of any items placed on the area under their former lease if a future lessee is not willing to assume responsibility for the use or removal of those items.

GP61

33-2 There are bigots in the neighborhood whose only objection to this important youth camp is the fact that it will be established and managed by the Muslim community.

Comment noted.

GP80

33-3 The majority of residents in the community and across the country have expressed opposing views to the MYCA proposal. There is only one winner in this solution and it is not the residents of North Liberty.

Comment noted. Please see response to comment 7-2.

GP64

33-5 I am opposed to the site being leased to MYCA.

Comment noted. Please see response to comment 7-2.

GP6

GP8

GP26

GP29

GP30

GP31

GP59

GP64

GP83

GP89

GP90

GP92

33-6 What is the cost of the study and who is paying for it?

The cost for preparation of the Environmental Assessment by Zambrana Engineering, Inc. was \$116,518.39, paid by the Rock Island District Corps of Engineers.

GP27
GP77
GP97

33-7 I notice that MYCA filed under the nonprofit status of 504A rather than the usual 501c3 status. What are the differences?

MYCA is organized under Iowa Code Chapter 504A, which is the Iowa Nonprofit Corporation Act. 26 USCS 501(c)(3) is the Federal Code describing organizations exempt from taxation based on religious, charitable, scientific, testing for public safety, literary, or educational purpose. MYCA also applied for exemption under 26 USCS 501(c)(3). The status of this application is unknown at this time.

GP27

33-8 I am opposed to the site being leased to Muslims. A Muslim youth camp should not be located in Iowa.

Comment noted. Please see response to comment 7-2. The federal government does not discriminate based on religious preference.

GP9
GP25
GP30
GP54
GP77

33-9 Express support for the proposed MYCA development. The camp would provide a positive experience for youth and should be considered just as favorably as a proposal for a Christian or a secular youth camp.

Comment noted.

GP4
GP14
GP43
GP80

33-10 I would welcome the opportunity to interact with a more diverse culture in the Johnson County community, to learn more about a major world religion, and to use the conference center for conventions or meetings.

Comment noted.

G5
GP75

33-11 Issues like increased traffic or noise levels are valid concerns that should be considered and addressed with sound planning, sensitive design, and good management of the facilities and activities in a post development state.

The lessee would assume responsibility, under the terms of the lease, for almost all matters relating to the construction of facilities, and the operation and maintenance of the premises. A Development and Management Plan, part of the lease, would designate where improvements would be placed and explain how the facilities and premises would be managed, operated, and maintained. Issues such as sound planning, sensitive design, and good management of the facilities would be addressed in this plan.

G5
GP75

33-12 I wish to register intense concern over the proposed lease of Camp Daybreak.

Comment noted. Please see response to comment 7-2.

GP3
GP72

33-14 The MYCA project would be better off in a more secluded, less controversial site.

The Corps Master Plan designates the former Camp Daybreak site as an area for high density recreation which is consistent with Alternative 1, a level use as represented by the MYCA proposal. It is expected that the needs of any non-profit organization that seeks to lease the site, including locational needs, the site setting, and recreational amenities available, will be met at this location. Refer also to responses to comments 2-2 and 2-3.

G5
GP67

- 33-15 The EA states that "the purpose of the EA is not to evaluate a specific application or applicant." I would like to know who will evaluate a specific applicant and when this will occur?**

Lease applications for the Camp Daybreak site were reviewed prior to preparation of the Environmental Assessment. The lease applicant, MYCA, was chosen at that time. If the lease process is not completed successfully with MYCA, the EA would still be valid in the event another lease applicant is chosen. However, any subsequent proposals for this site, if applicable, must be within the level of development evaluated in the EA.

GP93

- 33-16 The facility would be more appropriately located closer to an interstate/airport/large city where the services they will require can be provided.**

Comment noted. Please see response to comment 33-14.

G5
GP41
GP78

- 33-17 A Muslim youth camp is a good idea and may serve to ease tensions between Muslims and people of other faiths.**

Comment noted.

GP56
GP84

- 33-18 Why was the Girl Scout camp not permitted to make major alterations?**

The Girl Scout Council did make improvements to the site under their lease including tent platforms and lodge on a smaller scale than that proposed by MYCA. Please see section 2.1 of the EA for a complete description of site improvements made by the Girl Scouts. The Girl Scout Council did not request authorization to make additional alterations and improvements on the lease area. If the Girl Scouts had proposed additional alterations and improvements on the lease area, the Corps would have pursued authorizing them, just as for the MYCA proposal.

GP61

- 33-19 Please provide me with the list of the people in the US Corps that will make the final decision on the fate of this project, and what choice they made.**

The Rock Island District Engineer will make the final decision on the Environmental Assessment. When the final decision on the EA is made, all parties on the original distribution list and any additional people who submitted public comments on the EA will be notified by mail of the availability of the decision documentation, comment letters and responses, and locations for viewing this package. This package will be posted on the Corps web site. Hard copies will be available at area post offices, libraries, and at the Coralville Lake project office. Once the environmental process is completed, the Rock Island District Real Estate Division will complete the lease negotiations and oversee the lease.

GP97

- 33-21 The Muslim group should be able to apply to lease the land based on fair market value rather than the small amount that is being proposed.**

Corps of Engineers regulations provide that nonprofit organizations may be granted leases for recreational purposes at reduced or nominal consideration in recognition of the public services provided by the lessee. Since MYCA will operate a summer youth camp on the premises and will make the facilities available for use by other nonprofit organizations when not being used in connection with MYCA's activities, the Corps considers that nominal consideration is appropriate. Any fees that MYCA collects for use of the premises and facilities must be utilized for the administration, maintenance, operation, and development of the premises. Any monies not so utilized must be paid to the United States.

GP35

- 33-22 The housing and instructional facilities should be integrated in a less isolated area, so that true integration of the campers into our daily life might actually occur.**

Comment noted. Specific elements of site development would occur during preliminary and final site design and would be consistent with the lease and the objectives of the lessee.

GP98

33-25 How will the property lines be defined in the woods?

Construction of fences is not proposed in any of the alternatives. Property surveys would be included as part of final design.

GP44

33-26 Leasing the land for a camp/conference center is not in the best interest of North Liberty or Johnson County residents.

Comment noted. Please see response to comment 7-2.

GP91

33-27 I take issue with and am personally insulted by the statement that the primary purpose of the girl scouts "was to provide other organizations with similar beliefs and principles, the opportunity..."

Comment noted.

GP96

33-28 The Corps is planning to build a Muslim Youth Camp of America convention center with a multi-story hotel to house hundreds of Muslim youth.

The Corps is currently considering leasing the 106 acre site. Any facilities would be financed and built by the lessee. Alternative 1, a level of use which is represented by the MYCA proposal, includes tent pads and cabins for campers, and a central lodge which would not provide overnight lodging. The proposal does not include a convention center nor a hotel. One hundred and twenty campers and 16 staff would be present on a daily basis during the summer camping season.

C2

33-31 Area property owners and area governmental organizations have opposed the project due to the magnitude and the vast difference from any previous usage of the area.

Comment noted. Numerous comments have been received by the Corps from the public and area governmental organizations regarding the scale of the project. Please see response to comments 2-7, 2-11, 2-18, and 6-9.

C1

GP74

GP87

33-32 Area governmental organizations believe that approval of the lease without more significant investigation and resolution of issues would be premature. These organizations believe that the proposed project will have a greater impact on the residents of North Liberty than is recognized in the EA.

The Corps has been working with government organizations to resolve issues of disagreement and will continue to do so throughout lease negotiations.

G2

G4

G5

33-33 The proposal is not a camp by definition. Suggest calling it a compound.

Please see response to comment 33-28. Alternative 1 proposes establishment of a youth camp and conference retreat center on the site.

GP69

GP96